

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Crim. No. 05-10003-NMG
	)	
ARTHUR GIANELLI,	)	Violations:
JOSEPH YERARDI, JR.,	)	18 USC 1962(c); 1962(d);
DENNIS ALBERTELLI A/K/A "FISH,"	)	371; 844(i); 1084; 1951;
SALVATORE RAMASCI A/K/A "LEFTY,"	)	1952(a)(3); 1955; 1963;
RANDY ALBERTELLI,	)	1956(a)(1)(A)(i); 981;
GISELE ALBERTELLI,	)	1956(a)(1)(B)(i); 982;
RAFIA FEGHI A/K/A RAFIA YERARDI,	)	1956(h); and 2.
TONY DANIELS A/K/A "SONNY,"	)	
FRANK IACABONI,	)	
DEEB HOMSI,	)	
TODD WESTERMAN,	)	
ENEYDA GONZALEZ RODRIGUEZ, and	)	
WESHTOD CONSULTANTS A/K/A	)	
WESHTOD CONSULTORES S.A.	)	
	)	
Defendants.	)	
	)	

SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY in and for the District of  
Massachusetts charges that:

COUNT ONE  
(Racketeering Conspiracy)

THE ENTERPRISE

1. From in or before 1999 and continuing until in or about  
April 2005, within the District of Massachusetts and elsewhere,  
the defendants, ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS  
ALBERTELLI, SALVATORE RAMASCI, RANDY ALBERTELLI, GISELE  
ALBERTELLI, RAFIA FEGHI A/K/A RAFIA YERARDI, TONY DANIELS, FRANK  
IACABONI, DEEB HOMSI, TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ,

WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A., and others known and unknown to the grand jury, were members and associates of a criminal organization (hereinafter the "Gianelli Group") whose members and associates associated together and with others for the purpose of, among other things, earning money through illegal gambling activities, extortion, money laundering, and committing crimes of violence including arson.

2. The Gianelli Group, including its leadership, membership, and associates, constituted an "enterprise" as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce. The Gianelli Group affected interstate and foreign commerce by, among other things, the use of an offshore internet gambling site located in San Jose, Costa Rica, the extortion of individuals and entities whose activities affected interstate commerce, the control and operation of businesses affecting interstate commerce, the use of financial institutions affecting interstate commerce, and travel in interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At times material to the allegations contained in this indictment:

a. The defendant **ARTHUR GIANELLI** was the leader of the Gianelli Group. In that capacity, **GIANELLI** was responsible for the overall management of the group's criminal activities including the operation of several illegal gambling businesses and the laundering of the proceeds of those illegal gambling businesses by investing the proceeds in otherwise legitimate businesses. One of the illegal gambling businesses operated by the Gianelli Group was a sports betting business. A second gambling business operated by the Gianelli Group involved the illegal use of electronic gaming machines. A third illegal gambling business operated by members and associates of the enterprise involved the sale, distribution, and use of "football cards."

b. The defendant **JOSEPH YERARDI, JR.** was convicted in 1995 for racketeering and related offenses including the operation of an illegal gambling business. As a result, **YERARDI** was incarcerated from approximately January 1995 through February 2005 except for a short period of time from August through October 2004. Despite his incarceration, **YERARDI** played a significant role in the management of the Gianelli Group's affairs by maintaining frequent contacts with members and associates of the enterprise. While **YERARDI** was incarcerated,

the defendant **GIANELLI** operated **YERARDI's** gambling business and forwarded some of the proceeds of that illegal activity to **YERARDI** and **YERARDI's** wife, the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI**.

c. The defendant **DENNIS ALBERTELLI A/K/A "FISH"** managed the sports betting business for **GIANELLI**. **ALBERTELLI** also acted as an agent for the sports betting business, i.e., **ALBERTELLI** had his own customers and collected a commission from the business if his customers lost money. **ALBERTELLI** also assisted **GIANELLI** in the operation of an illegal electronic gaming machine business. **ALBERTELLI** also operated an illegal gambling business involving the use and distribution of football cards. **ALBERTELLI's** son, the defendant **RANDY ALBERTELLI**, and **ALBERTELLI's** wife, the defendant **GISELE ALBERTELLI**, also participated in the operation of this illegal football card business.

d. The defendant **SALVATORE RAMASCI A/K/A "LEFTY"** acted as the bookkeeper for the Gianelli Group's illegal sports betting business. **RAMASCI** coordinated the collection of money due to the gambling business and the payout of money owed by the gambling business. **RAMASCI** also participated in the distribution of proceeds of this illegal gambling business to other members of the conspiracy including the defendants **JOSEPH YERARDI, JR.**

and **RAFIA FEGHI**.

e. The defendant **RANDY ALBERTELLI** participated in the Gianelli Group's illegal sports betting business. **RANDY ALBERTELLI** acted as an agent for the sports betting business, i.e., he had customers who placed bets with the business and he collected a commission on those bets. In that capacity, **RANDY ALBERTELLI** collected money owed by bettors to the Gianelli Group and paid money owed to bettors. **RANDY ALBERTELLI** also participated in an illegal football card business managed by his father, the defendant **DENNIS ALBERTELLI**.

f. The defendant **GISELE ALBERTELLI** is the wife of the defendant **DENNIS ALBERTELLI** and the mother of the defendant **RANDY ALBERTELLI**. **GISELE ALBERTELLI** participated in laundering proceeds of the Gianelli Group's sports betting business. **GISELE ALBERTELLI** also participated in the illegal football card business managed by the defendant **DENNIS ALBERTELLI**.

g. The defendant **RAFIA FEGHI A/K/A RAFIA YERARDI** is the wife of the defendant **JOSEPH YERARDI, JR.** **FEGHI** was involved as a witness in litigation in federal court in matters surrounding the criminal activities of the defendant **JOSEPH YERARDI, JR.** including matters related to bail and forfeiture. **FEGHI** knowingly received proceeds generated from the criminal activities of the Gianelli Group which acted as a

caretaker for the defendant **JOSEPH YERARDI, JR.**'s criminal affairs. **FEGHI** engaged in assorted schemes to conceal the true source of these proceeds including laundering some proceeds through the bank account of her first husband, Yousef Bina.

h. The defendant **TONY DANIELS A/K/A "SONNY"** participated in the operation of the Gianelli Group's sports betting business. **DANIELS** acted as the liaison between the Gianelli Group and the operators of an offshore gambling office in San Jose, Costa Rica utilized by the Gianelli Group. **DANIELS** laundered proceeds of the Gianelli Group's sports betting business through several bank accounts including a bank account in the British West Indies in order to pay the operators of the offshore gambling office for the services they provided to the Gianelli Group.

i. The defendant **TODD WESTERMAN**, president of the defendant **WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.**, operated an offshore gambling office in San Jose, Costa Rica. The defendant **ENEYDA GONZALEZ RODRIGUEZ**, secretary of the defendant **WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.**, assisted **WESTERMAN** in the operation of the offshore gambling office in San Jose, Costa Rica. **WESTERMAN** and **GONZALEZ RODRIGUEZ** provided services to the Gianelli Group including a toll-free long distance telephone line so that bettors inside the District

of Massachusetts could place their bets over the telephone with the offshore office. **WESTERMAN** and **GONZALEZ RODRIGUEZ** also provided an internet site for the Gianelli Group's sports betting business so that bettors could place their bets over the internet. This internet site was accessed by bettors in the District of Massachusetts and elsewhere through the web address DukeSportsweb.com.

j. The defendant **FRANK IACABONI** was a close associate of the defendant **DENNIS ALBERTELLI**. **IACABONI** was a longtime bookmaker who participated in the Gianelli Group's sports betting business and the illegal football card business managed by **ALBERTELLI**. **IACABONI** also conspired with members of the Gianelli Group to damage a building by a fire or explosion when the owner of one of the businesses located in the building became involved in a dispute with members of the Gianelli Group.

k. The defendant **DEEB HOMSI** was a close associate of the defendant **DENNIS ALBERTELLI**. **ALBERTELLI** relied upon **HOMSI** to provide "muscle" to assist **ALBERTELLI** in the collection of unlawful debts. **HOMSI** also conspired with members of the Gianelli Group to damage a building by a fire or explosion when the owner of one of the businesses located in the building became involved in a dispute with members of the Gianelli Group.

GOALS AND PURPOSES OF THE ENTERPRISE

4. The primary goals and purposes of the Gianelli Group included the following:

a. Generating money for members and associates of the enterprise through illegal gambling activities, the collection of unlawful debts, and extortion.

b. Laundering the proceeds of the aforementioned criminal activity for distribution to members and associates of the enterprise.

c. Engaging in the use of threats of violence and other methods of intimidation including arson to achieve the goals of the enterprise.

MEANS AND METHODS OF THE ENTERPRISE

5. To further their goal of generating money for the enterprise, members and associates of the Gianelli Group operated several illegal gambling businesses, loaned money at usurious rates, and invested the proceeds of their illegal activities in otherwise legitimate businesses.

6. The Gianelli Group associated itself with certain members of organized crime including members of the New England Family of La Cosa Nostra. This relationship enhanced the Gianelli Group's ability to operate the Group's criminal businesses. This relationship also protected the members and associates of the Gianelli Group from encroachment by other



criminal competitors. The leaders of the Gianelli Group made payments to certain members of the New England Family of La Cosa Nostra for the "right" to operate their criminal businesses. These payments are colloquially known as "tribute" or "rent."

7. Members and associates of the Gianelli Group engaged in financial transactions with the proceeds of the Gianelli Group's criminal activities, many of which were designed, in whole or in part, to disguise the nature and sources of those proceeds and the relationships of members and associates of the Gianelli Group to those assets, and to shield those proceeds from seizure and forfeiture by law enforcement authorities. For example, members and associates of the Gianelli Group purchased postal money orders that were used in part to transfer proceeds of the Gianelli Group's illegal gambling activities to the defendant **JOSEPH YERARDI, JR.** and **YERARDI's** wife, the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI.**

8. Members and associates of the Gianelli Group infiltrated otherwise legitimate businesses and attempted to gain control of those businesses. They also used these businesses as vehicles to engage in money laundering schemes. Further, members and associates of the Gianelli Group used threats of force and intimidation including arson to attempt to gain ownership and control of the aforementioned businesses. The business thus affected included the following:

a. Ben-Cor LLC d/b/a McCarthy's Bar and Grille, located at 903 Boylston Street in Boston, Massachusetts.

b. 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon, located at 21 Merchants Row in Boston, Massachusetts.

c. The Canine Entertainment Corp. d/b/a The Big Dog Sports Grille located at 325 Broadway in Lynnfield, Massachusetts.

9. Similarly, members and associates of the Gianelli Group operated businesses engaged in legitimate business activities that were used to launder some of the proceeds of the Gianelli Group's illegal activities.

10. A part of the proceeds of the enterprise's illegal sports betting business was laundered to make it appear as though Mary Ann Gianelli, wife of the defendant **ARTHUR GIANELLI**, had a legitimate source of income. The defendants **ARTHUR GIANELLI**, **DENNIS ALBERTELLI**, and **GISELE ALBERTELLI** engaged in an elaborate scheme to cause Dennele Transportation and Forge Village Transportation, two trucking companies with which the defendants **DENNIS ALBERTELLI** and **GISELE ALBERTELLI** were associated, to issue checks for services performed by Mary Ann Gianelli when no such services were, in truth and fact, provided. The principals of Dennele Transportation and Forge Village Transportation were subsequently reimbursed with cash payments from the proceeds of

the Gianelli Group's illegal sports betting business.

THE RACKETEERING CONSPIRACY

11. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI,  
RANDY ALBERTELLI,  
GISELE ALBERTELLI,  
RAFIA FEGHI A/K/A RAFIA YERARDI,  
TONY DANIELS  
FRANK IACABONI,  
DEEB HOMSI,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ, and  
WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.,

and others known and unknown to the grand jury, being persons employed by and associated with the Gianelli Group, which enterprise engaged in, and whose activities affected, interstate and foreign commerce, did knowingly and intentionally conspire, confederate and agree to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and 1961(5).

12. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two of the following acts of racketeering constituting, or being part of, the pattern of racketeering activity referred to in paragraph eleven.

RACKETEERING ACT NUMBER ONE  
(Illegal Gambling Business - Sports Betting)

13. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI, SALVATORE RAMASCI, RANDY ALBERTELLI, FRANK IACABONI, TONY DANIELS, TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ, and WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.**, aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: a sports betting business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day in violation of Title 18, United States Code, Sections 1955 and 2.

RACKETEERING ACT NUMBER TWO  
(Illegal Gambling Business - Electronic Gaming Machines)

14. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, and SALVATORE RAMASCI**, aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: the illegal operation of electronic gaming machines which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day in violation of Title 18, United States Code, Sections 1955 and 2.

RACKETEERING ACT NUMBER THREE  
(Illegal Gambling Business - Football Cards)

15. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants **DENNIS ALBERTELLI, RANDY ALBERTELLI, GISELE ALBERTELLI, ARTHUR GIANELLI, and FRANK IACABONI**, aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of

an illegal gambling business to wit: a football card business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day in violation of Title 18, United States Code, Sections 1955 and 2.

RACKETEERING ACT NUMBER FOUR  
(Use of Wire Communication Facility - Telephone)

16. In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI, SALVATORE RAMASCI, RANDY ALBERTELLI, TONY DANIELS, TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ, and WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.**, aided and abetted by others known and unknown to the Grand Jury, being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers,

namely, the defendants provided the use of a toll-free telephone line to an offshore gaming office located in San Jose, Costa Rica for the purpose of placing wagers on sporting events in violation of Title 18, United States Code, Sections 1084 and 2.

RACKETEERING ACT NUMBER FIVE  
(Use of Wire Communication Facility - Internet)

17. In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI, SALVATORE RAMASCI, RANDY ALBERTELLI, TONY DANIELS, TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ, and WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.**, aided and abetted by others known and unknown to the Grand Jury, being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants provided an internet site located in San Jose, Costa Rica for the purpose of placing wagers on sporting events in violation of Title 18, United States Code, Sections 1084 and 2.

RACKETEERING ACT NUMBER SIX  
(Money Laundering Conspiracy)

18. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity in violation of Section 1956(h) of Title 18 of the United States Code.

a. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI** in the form of cash and postal money orders. These



postal money orders aggregated approximately \$114,600.

b. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **JOSEPH YERARDI, JR.** in the form of postal money orders deposited into **YERARDI's** prison "canteen" account. Other postal money orders which represented proceeds of the illegal gambling business were sent to prison canteen accounts of other inmates designated by **YERARDI**. Further, postal money orders which represented proceeds of the illegal gambling business were forwarded at **YERARDI's** direction to other members of **YERARDI's** family. These postal money orders aggregated approximately \$74,300.

c. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, GISELE ALBERTELLI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **ARTHUR GIANELLI** by exchanging cash for checks payable to **GIANELLI's** wife, Mary Ann. The checks were drawn on the business accounts of two businesses with which the defendants **DENNIS ALBERTELLI** and **GISELE ALBERTELLI** were associated. The checks were drawn to make it appear as though Mary Ann Gianelli had a legitimate source of income and that the payments to Mary Ann Gianelli were legitimate business expenses. These checks aggregated approximately \$238,385.

d. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI, TONY DANIELS**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendants **TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ**, and **WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.** The defendant **DANIELS** converted cash proceeds of the illegal gambling business to bank checks which he forwarded to Cypress Escrow located in Nevis, West Indies to pay the defendants **TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ**, and **WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.** for services provided to the Gianelli Group. These checks aggregated approximately \$37,419.

e. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille and The Big Dog Realty Trust. This investment was made through payments in cash and checks used for multiple purposes related to the business of The Big Dog Sports Grille. The cash and checks aggregated approximately \$705,700.

f. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in Sports

Zone, Inc. This investment was made through payments in cash and checks used for multiple purposes related to the business of Sports Zone, Inc. The cash and checks aggregated approximately \$200,000.

g. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to **GIANELLI**'s paramour Daniele Mazzei in the form of cash and postal money orders. The postal money orders aggregated approximately \$25,600.

h. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, deposited proceeds of the illegal gambling business into Sovereign Bank account number 41004947572 held in the name of Christine A. Leone d/b/a C&L Management. **GIANELLI** used this account to pay his personal expenses among other things. Cash deposited into this account aggregated approximately \$106,890.

**RACKETEERING ACT NUMBER SEVEN**  
(Money Laundering - Rafia Feghi)

19. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act #7.

a. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive,

within the District of Massachusetts and elsewhere, the defendants **JOSEPH YERARDI, JR.,** and **RAFIA FEGHI A/K/A RAFIA YERARDI** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI, SALVATORE RAMASCI,** and **RAFIA FEGHI A/K/A RAFIA YERARDI,** aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal

gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$77,000 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>	<u>Payee</u>
(1)	8/31/2002	\$1,000.00	4906103477	Belmont Hill School
(2)	9/8/2002	\$1,000.00	5993558616	American Express
(3)	9/11/2002	\$1,000.00	5993562317	American Express
(4)	9/18/2002	\$1,000.00	4906105852	FCNB
(5)	9/27/2002	\$1,000.00	5017442365	Archstone Bearhill
(6)	9/28/2002	\$1,000.00	4906109520	Belmont Hill School
(7)	9/28/2002	\$1,000.00	4906109542	Belmont Hill School
(8)	10/10/2002	\$1,000.00	5017270713	MBNA America
(9)	10/25/2002	\$1,000.00	4906106662	American Express
(10)	10/31/2002	\$1,000.00	4906119341	American Express
(11)	11/8/2002	\$1,000.00	5019283203	Belmont Hill School
(12)	11/8/2002	\$1,000.00	5019283192	Belmont Hill School
(13)	11/16/2002	\$1,000.00	5017194900	FCNB
(14)	11/19/2002	\$1,000.00	4627804230	American Express
(15)	11/25/2002	\$1,000.00	5019319618	American Express
(16)	12/5/2002	\$1,000.00	5246731271	American Express
(17)	12/10/2002	\$1,000.00	5246731495	American Express
(18)	12/10/2002	\$1,000.00	5019295105	Belmont Hill School
(19)	12/10/2002	\$1,000.00	5019295116	Belmont Hill School
(20)	12/21/2002	\$1,000.00	4906124302	Rafia Feghi
(21)	12/24/2002	\$1,000.00	5254609151	American Express
(22)	12/30/2002	\$1,000.00	5254608745	American Express
(23)	1/9/2003	\$1,000.00	5017066762	American Express
(24)	1/16/2003	\$1,000.00	5254709692	Belmont Hill School
(25)	1/16/2003	\$1,000.00	5254709681	Belmont Hill School

(26)	1/27/2003	\$1,000.00	5013507003	American Express
(27)	2/6/2003	\$1,000.00	5013505473	American Express
(28)	2/11/2003	\$1,000.00	5254623246	Yossef Bina
(29)	2/19/2003	\$1,000.00	5254614551	Yossef Bina
(30)	2/25/2003	\$1,000.00	5246747482	American Express
(31)	2/25/2003	\$1,000.00	5013513540	Belmont Hill School
(32)	2/25/2003	\$1,000.00	5013513551	Belmont Hill School
(33)	3/12/2003	\$1,000.00	5013516205	American Express
(34)	3/18/2003	\$1,000.00	5255791481	Yossef Bina
(35)	3/27/2003	\$1,000.00	5254646411	Rafia Feghi
(36)	4/2/2003	\$1,000.00	5254626194	Belmont Hill School
(37)	4/2/2003	\$1,000.00	5254626205	Belmont Hill School
(38)	4/8/2003	\$1,000.00	5256529097	Rafia Feghi
(39)	4/14/2003	\$1,000.00	5013520233	Belmont Hill School
(40)	4/14/2003	\$1,000.00	5013520244	Green Point Mortgage
(41)	4/16/2003	\$1,000.00	5666179353	Belmont Hill School
(42)	4/22/2003	\$1,000.00	5666183638	Green Point Mortgage
(43)	4/30/2003	\$1,000.00	5666187150	Rafia Feghi
(44)	5/6/2003	\$1,000.00	5559229484	American Express
(45)	5/23/2003	\$1,000.00	5666940551	Green Point Mortgage
(46)	5/27/2003	\$1,000.00	5666515773	Rafia Feghi
(47)	6/7/2003	\$1,000.00	5667307110	American Express
(48)	6/12/2003	\$1,000.00	5666179948	American Express
(49)	6/20/2003	\$1,000.00	5666523884	Fidelity
(50)	6/26/2003	\$1,000.00	5666185563	Fidelity
(51)	7/3/2003	\$1,000.00	5666957414	American Express
(52)	7/12/2003	\$1,000.00	5246754952	American Express
(53)	7/21/2003	\$1,000.00	5559245853	Belmont Hill School
(54)	7/21/2003	\$1,000.00	5559245864	Belmont Hill School
(55)	7/26/2003	\$1,000.00	5992269197	American Express
(56)	8/8/2003	\$1,000.00	5993553780	American Express
(57)	8/14/2003	\$1,000.00	5667314073	Washington Mutual
(58)	8/22/2003	\$1,000.00	5994372262	Belmont Hill School
(59)	8/22/2003	\$1,000.00	5994372251	Belmont Hill School
(60)	8/22/2003	\$1,000.00	5666198883	Rafia Feghi
(61)	8/29/2003	\$1,000.00	5993558256	Rafia Feghi
(62)	9/15/2003	\$1,000.00	5993563498	Rafia Feghi
(63)	9/25/2003	\$1,000.00	5881185303	Belmont Hill School
(64)	9/25/2003	\$1,000.00	5881185314	Belmont Hill School
(65)	9/25/2003	\$1,000.00	5993561788	Washington Mutual
(66)	10/1/2003	\$1,000.00	5992622436	Rafia Feghi
(67)	10/11/2003	\$1,000.00	5881189601	American Express
(68)	10/16/2003	\$1,000.00	5992626183	Washington Mutual
(69)	10/22/2003	\$1,000.00	6244176846	Belmont Hill School
(70)	10/22/2003	\$1,000.00	6244176857	Belmont Hill School
(71)	10/22/2003	\$1,000.00	6245769363	Belmont Hill School
(72)	10/22/2003	\$1,000.00	6245769374	Washington Mutual

(73)	11/3/2003	\$1,000.00	6245773762	American Express
(74)	11/5/2003	\$1,000.00	6245854020	American Express
(75)	11/12/2003	\$1,000.00	5881194235	Rafia Feghi
(76)	11/21/2003	\$1,000.00	6245748393	Belmont Hill School
(77)	11/21/2003	\$1,000.00	6244191516	Belmont Hill School

RACKETEERING ACT NUMBER EIGHT

(Money Laundering - Joseph Yerardi, Jr.)

20. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act #8.

a. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **JOSEPH YERARDI, JR.** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or before 1999 and continuing until in or



about April 2005, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI**, and **SALVATORE RAMASCI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$52,050 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>	<u>Payee</u>
(1)	8/31/2002	\$500.00	4412546853	Elizabeth Yerardi
(2)	8/31/2002	\$300.00	4906103455	FCI Raybrook
(3)	8/31/2002	\$500.00	4412546864	FCI Raybrook
(4)	9/8/2002	\$300.00	5993558638	FCI McKean
(5)	9/8/2002	\$500.00	5993558627	Linda Yerardi
(6)	9/11/2002	\$500.00	5993562328	Linda Yerardi
(7)	9/18/2002	\$600.00	5017441476	Elizabeth Yerardi
(8)	9/27/2002	\$600.00	5017442376	Elizabeth Yerardi



(9)	10/22/2002	\$300.00	5017453367	FCI McKean
(10)	11/5/2002	\$300.00	4630588470	Linda Yerardi
(11)	11/5/2002	\$700.00	4630588468	Linda Yerardi
(12)	11/16/2002	\$1,000.00	5017194911	Linda Yerardi
(13)	11/19/2002	\$500.00	4627804241	FCI Raybrook
(14)	11/19/2002	\$1,000.00	4627804228	Linda Yerardi
(15)	11/21/2002	\$300.00	5019285328	FCI Raybrook
(16)	11/23/2002	\$300.00	4630587772	FCI Raybrook
(17)	11/25/2002	\$300.00	5019319631	FCI Raybrook
(18)	11/25/2002	\$1,000.00	5019319620	Linda Yerardi
(19)	11/26/2002	\$400.00	4630579582	Alissa Yerardi
(20)	12/4/2002	\$1,000.00	5017459511	Linda Yerardi
(21)	12/10/2002	\$1,000.00	5017459803	Joseph & Elizabeth Yerardi
(22)	12/10/2002	\$500.00	5019295138	Joseph Yerardi Sr
(23)	12/10/2002	\$1,000.00	5246731506	Linda Yerardi
(24)	12/21/2002	\$300.00	4906124335	FCI Raybrook
(25)	12/21/2002	\$1,000.00	4906124313	Linda Yerardi
(26)	12/24/2002	\$300.00	5254609116	FCI Raybrook
(27)	12/30/2002	\$1,000.00	5254608734	Linda Yerardi
(28)	1/9/2003	\$500.00	5017066773	Alissa Yerardi
(29)	1/9/2003	\$1,000.00	5017066751	Linda Yerardi
(30)	1/21/2003	\$300.00	4630594961	Linda Yerardi
(31)	1/21/2003	\$700.00	4630594950	Linda Yerardi
(32)	1/27/2003	\$300.00	4630596963	FCI Raybrook
(33)	1/29/2003	\$300.00	5254616417	FCI Raybrook
(34)	1/29/2003	\$1,000.00	5254616406	Linda Yerardi
(35)	1/30/2003	\$300.00	5246743307	FCI Raybrook
(36)	2/6/2003	\$200.00	5246742690	Alissa Yerardi
(37)	2/6/2003	\$400.00	5246742677	Alissa Yerardi
(38)	2/6/2003	\$500.00	5013505506	Alissa Yerardi
(39)	2/6/2003	\$1,000.00	5013505484	Linda Yerardi
(40)	2/11/2003	\$1,000.00	5254623257	Linda Yerardi
(41)	2/19/2003	\$1,000.00	5254614540	Linda Yerardi
(42)	2/25/2003	\$1,000.00	5246747493	Linda Yerardi
(43)	3/4/2003	\$300.00	5246750564	FCI Raybrook
(44)	3/5/2003	\$1,000.00	5246747820	Joseph Yerardi
(45)	3/12/2003	\$500.00	5013516216	Alissa Yerardi
(46)	3/12/2003	\$300.00	5256522000	FCI Raybrook
(47)	3/12/2003	\$1,000.00	5254726994	Linda Yerardi
(48)	3/13/2003	\$300.00	5254628128	FCI Raybrook

(49)	3/18/2003	\$1,000.00	5255791492	Linda Yerardi
(50)	3/27/2003	\$1,000.00	5254646400	Linda Yerardi
(51)	3/31/2003	\$300.00	4630932022	Linda Yerardi
(52)	3/31/2003	\$700.00	4630932011	Linda Yerardi
(53)	4/8/2003	\$1,000.00	5256529108	Linda Yerardi
(54)	4/14/2003	\$200.00	5013520277	Alissa Yerardi
(55)	4/14/2003	\$200.00	5013520255	Elizabeth Yerardi
(56)	4/16/2003	\$500.00	5666179342	Alissa Yerardi
(57)	5/6/2003	\$200.00	5559229528	Elizabeth Yerardi
(58)	5/6/2003	\$200.00	5559229517	Elizabeth Yerardi
(59)	5/8/2003	\$500.00	5666515312	Alissa Yerardi
(60)	5/23/2003	\$500.00	5666940562	Linda Yerardi
(61)	5/27/2003	\$500.00	5666515784	Linda Yerardi
(62)	6/2/2003	\$500.00	5559236853	Alissa Yerardi
(63)	6/7/2003	\$500.00	5667307132	Linda Yerardi
(64)	6/12/2003	\$500.00	5666179961	Linda Yerardi
(65)	6/20/2003	\$500.00	5666523906	Linda Yerardi
(66)	6/26/2003	\$500.00	5666185585	Linda Yerardi
(67)	7/3/2003	\$500.00	5666957436	Linda Yerardi
(68)	7/12/2003	\$500.00	5246754974	Linda Yerardi
(69)	7/16/2003	\$500.00	5559245583	Linda Yerardi
(70)	7/26/2003	\$500.00	5992269210	Linda Yerardi
(71)	8/2/2003	\$500.00	4630940335	Alissa Yerardi
(72)	8/2/2003	\$500.00	4630940324	Linda Yerardi
(73)	8/8/2003	\$500.00	5993553936	Linda Yerardi
(74)	8/14/2003	\$500.00	5559248992	FCI McKean
(75)	8/14/2003	\$500.00	5667314084	Linda Yerardi
(76)	8/22/2003	\$500.00	5666198905	Linda Yerardi
(77)	8/29/2003	\$500.00	5993558280	Alissa Yerardi
(78)	8/29/2003	\$300.00	5992617262	FCI McKean
(79)	8/29/2003	\$500.00	5993558278	Linda Yerardi
(80)	8/30/2003	\$300.00	5881179374	FCI McKean
(81)	9/15/2003	\$500.00	5993563500	Linda Yerardi
(82)	9/25/2003	\$500.00	5993561801	Linda Yerardi
(83)	10/1/2003	\$500.00	5992622458	Alissa Yerardi
(84)	10/1/2003	\$300.00	5992622460	FCI McKean
(85)	10/9/2003	\$300.00	5993560528	FCI McKean
(86)	10/11/2003	\$300.00	5881189612	FCI McKean
(87)	10/22/2003	\$300.00	6245769385	FCI McKean

(88)	11/5/2003	\$500.00	6245854031	Alissa Yerardi
(89)	11/5/2003	\$300.00	6245854042	FCI McKean
(90)	11/6/2003	\$300.00	6244177320	FCI McKean
(91)	11/12/2003	\$300.00	5881194246	FCI McKean
(92)	12/3/2003	\$700.00	6245780332	Alissa Yerardi
(93)	12/3/2003	\$300.00	6245780343	FCI McKean
(94)	12/10/2003	\$500.00	6245783032	Alissa Yerardi
(95)	12/10/2003	\$550.00	6245783043	Alissa Yerardi
(96)	12/10/2003	\$300.00	6245783021	FCI McKean
(97)	12/17/2003	\$300.00	6245863694	FCI McKean
(98)	07/03/2003	\$500.00	5666957425	Alissa Yerardi

RACKETEERING ACT NUMBER NINE

(Money Laundering - Forge Village Transportation)

21. From in or about July 1999 and continuing until in or about April 2000, in the District of Massachusetts, the defendants **ARTHUR GIANELLI** and **DENNIS ALBERTELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks drawn on the account of Forge Village Transportation and made payable to Mary Ann Gianelli in the approximate aggregate amount of \$19,895 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to

conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(1)	7/15/1999	7526	\$758.03
(2)	7/22/1999	7530	\$628.15
(3)	7/29/1999	7534	\$809.57
(4)	8/5/1999	7358	\$660.51
(5)	8/19/1999	7548	\$639.81
(6)	9/2/1999	7556	\$517.51
(7)	9/9/1999	7560	\$712.14
(8)	10/7/1999	7577	\$578.85
(9)	10/14/1999	7581	\$539.18
(10)	10/21/1999	7585	\$679.94
(11)	10/28/1999	7589	\$514.43
(12)	11/10/1999	7598	\$540.60
(13)	11/18/1999	7603	\$554.56
(14)	11/24/1999	7611	\$496.03
(15)	12/8/1999	7617	\$490.18
(16)	12/9/1999	7622	\$533.04
(17)	12/16/1999	7627	\$504.79
(18)	12/23/1999	7632	\$544.50
(19)	12/30/1999	7636	\$541.18
(20)	1/6/2000	7641	\$424.56
(21)	1/13/2000	7645	\$573.53
(22)	1/20/2000	7649	\$550.54
(23)	1/27/2000	7653	\$545.67
(24)	2/3/2000	7658	\$541.93
(25)	2/10/2000	7664	\$495.23
(26)	2/17/2000	7670	\$578.88
(27)	2/24/2000	7675	\$497.20
(28)	3/2/2000	7680	\$504.11
(29)	3/9/2000	7686	\$489.46
(30)	3/16/2000	7691	\$474.22
(31)	3/23/2000	7696	\$517.78
(32)	3/30/2000	7701	\$563.74
(33)	4/6/2000	7707	\$420.89
(34)	4/13/2000	7713	\$511.33
(35)	4/20/2000	7720	\$441.75
(36)	4/27/2000	7727	\$522.04

RACKETEERING ACT NUMBER TEN  
(Money Laundering - Dennele Transportation)

22. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act #10.

a. From in or about May 2000 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **GISELE ALBERTELLI** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or about May 2000 and continuing until in or about March 2004, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, and GISELE ALBERTELLI**, aided and abetted by others known and unknown to the

Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks drawn on the account of Dennele Transportation and made payable to Mary Ann Gianelli in the approximate aggregate amount of \$129,000 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(1)	5/18/2000	1366	\$630.00
(2)	6/1/2000	1380	\$650.00
(3)	7/6/2000	1424	\$630.00
(4)	8/3/2000	1464	\$630.00
(5)	9/7/2000	1503	\$630.00
(6)	10/5/2000	1551	\$630.00
(7)	11/2/2000	1558	\$630.00
(8)	12/7/2000	1640	\$630.00
(9)	1/4/2001	1678	\$630.00
(10)	2/1/2001	1709	\$630.00
(11)	3/1/2001	1754	\$630.00
(12)	4/5/2001	1811	\$630.00
(13)	5/3/2001	1858	\$630.00
(14)	6/7/2001	1902	\$630.00

(15)	7/5/2001	1939	\$630.00
(16)	8/2/2001	1976	\$630.00
(17)	8/20/2001	2010	\$50,000.00
(18)	9/6/2001	2027	\$630.00
(19)	10/4/2001	2067	\$630.00
(20)	11/1/2001	2104	\$630.00
(21)	12/6/2001	2151	\$630.00
(22)	1/3/2002	2186	\$630.00
(23)	2/7/2002	2236	\$630.00
(24)	3/7/2002	2284	\$630.00
(25)	4/4/2002	2314	\$630.00
(26)	5/13/2002	2368	\$630.00
(27)	6/6/2002	2401	\$630.00
(28)	7/5/2002	2446	\$630.00
(29)	8/1/2002	2479	\$630.00
(30)	9/5/2002	2522	\$630.00
(31)	10/3/2002	2566	\$630.00
(32)	11/7/2002	2620	\$630.00
(33)	12/5/2002	2651	\$630.00
(34)	1/2/2003	2695	\$630.00
(35)	2/20/2003	2779	\$630.00
(36)	3/6/2003	2781	\$630.00
(37)	4/3/2003	2840	\$630.00
(38)	5/1/2003	2883	\$630.00
(39)	5/13/2003	2908	\$50,000.00
(40)	6/19/2003	2958	\$630.00
(41)	7/3/2003	2977	\$630.00
(42)	8/7/2003	3025	\$630.00
(43)	9/4/2003	3062	\$630.00
(44)	10/2/2003	3108	\$630.00
(45)	11/6/2003	3153	\$630.00
(46)	12/4/2003	3181	\$630.00
(47)	1/1/2004	3216	\$630.00
(48)	2/5/2004	3245	\$630.00

RACKETEERING ACT NUMBER ELEVEN  
(Money Laundering - Tony Daniels)

23. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act #11.

a. From in or about October 2003 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **TONY DANIELS, TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ, WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or about October 2003 and continuing until in or about February 2004, in the District of Massachusetts and



elsewhere, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, TONY DANIELS, TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ, and WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the conversion of cash to bank checks made payable to Cypress Escrow and subsequent negotiation of said checks intended to pay for services provided to the Gianelli Group by the defendants **TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ, and WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.** in the approximate aggregate amount of \$37,419 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Check</u>	<u>Amount</u>
(1)	10/14/2003	637628	\$6,200.00
(2)	10/15/2003	3859	\$12,400.00

(3) 2/19/2004 672480 \$18,819.00

RACKETEERING ACT NUMBER TWELVE  
(Money Laundering - The Big Dog)

24. From in or about June 1999 and continuing until in or about August 2003, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, and SALVATORE RAMASCI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the investment of said proceeds in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille and The Big Dog Realty Trust in the approximate aggregate amount of \$618,332 as specifically set forth in the subpredicate racketeering acts below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
(1)	6/24/1999	Cash Deposit	\$25,000.00
(2)	8/7/2000	Cash Deposit	\$27,000.00
(3)	9/21/2000	Cash Deposit	\$30,000.00
(4)	11/5/2000	Cash Deposit	\$25,000.00

(5)	12/4/2000	Cash Deposit	\$25,000.00
(6)	12/18/2000	Cash Deposit	\$20,000.00
(7)	7/11/2001	Coach Lane Realty Trust	\$5,204.00
(8)	7/16/2001	Coach Lane Realty Trust	\$75,000.00
(9)	8/9/2001	Coach Lane Realty Trust	\$5,250.00
(10)	10/13/2001	Coach Lane Realty Trust	\$7,956.00
(11)	11/14/2001	Coach Lane Realty Trust	\$5,250.00
(12)	12/28/2001	Coach Lane Realty Trust	\$5,250.00
(13)	2/15/2002	Coach Lane Realty Trust	\$5,250.00
(14)	4/18/2002	Coach Lane Realty Trust	\$5,250.00
(15)	4/24/2002	Regnante Sterio & Osborne	\$2,925.00
(16)	5/15/2002	Coach Lane Realty Trust	\$5,250.00
(17)	5/27/2002	Regnante Sterio & Osborne	\$2,500.00
(18)	6/6/2002	Coach Lane Realty Trust	\$5,250.00
(19)	6/13/2002	Hayes Engineering	\$3,000.00
(20)	7/10/2002	Regnante Sterio & Osborne	\$6,500.00
(21)	7/11/2002	Coach Lane Realty Trust	\$5,250.00
(22)	8/15/2002	Coach Lane Realty Trust	\$5,250.00
(23)	9/13/2002	Coach Lane Realty Trust	\$5,250.00
(24)	10/17/2002	Coach Lane Realty Trust	\$5,250.00
(25)	4/18/2003	N.E Coin Op	\$100,000.00
(26)	05/2003	Cash Deposit	\$50,000.00
(27)	5/7/2003	Roger Williams Mint	\$3,600.00
(28)	5/16/2003	Regnante Sterio & Osborne	\$10,000.00
(29)	5/16/2003	N.E Coin Op	\$50,000.00
(30)	6/6/2003	Roger Williams Mint	\$3,625.00
(31)	6/24/2003	Hayes Engineering	\$5,000.00
(32)	6/30/2003	N.E Coin Op	\$25,000.00
(33)	7/3/2003	Cash Deposit	\$20,000.00
(34)	7/7/2003	Acme Sign Corp	\$8,272.00
(35)	08/2003	Cash Deposit	\$30,000.00

RACKETEERING ACT NUMBER THIRTEEN

(Conspiracy and attempt to commit extortion - The Big Dog)

25. The defendants named below committed the following acts involving extortion, the commission of any one of which constitutes the commission of Racketeering Act #13.

a. From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, FRANK IACABONI, and DEEB HOMSI,**

and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Sections 1951 and 2.

b. From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, FRANK IACABONI, and DEEB HOMSI**, and others known and unknown to the grand jury, each aiding and abetting the other, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in that the defendants and their co-conspirators did attempt to damage and destroy a building located at 178 Main Street in North Reading, Massachusetts which housed a business establishment owned and operated by To The Dogs Restaurant Management, Corp. in violation of Title 18, United States Code, Sections 1951 and 2.

RACKETEERING ACT NUMBER FOURTEEN  
(Arson - The Big Dog)

26. On or about November 13, 2003, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, FRANK IACABONI, DEEB HOMSI**, and others known and unknown to the grand jury, each aiding and abetting the other, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, a building used in interstate commerce and engaged in an activity affecting interstate commerce in that the defendants and their co-conspirators did damage and attempt to damage the building located at 178 Main Street in North Reading, Massachusetts which housed two business establishments by igniting a container of gasoline with a rag affixed in violation of Title 18, United States Code, Section 844(i).

RACKETEERING ACT NUMBER FIFTEEN  
(Interstate travel in aid of racketeering enterprises - The Big Dog)

27. On or about and before November 13, 2003, in the District of Massachusetts and elsewhere, the defendants, **ARTHUR GIANELLI, DENNIS ALBERTELLI, DEEB HOMSI**, and others known and unknown to the grand jury, each aiding and abetting the other, did unlawfully, willfully, and knowingly cause Sean Slater to travel in interstate commerce from New York to Massachusetts, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying

on of unlawful activity, namely, arson in violation of Title 18, United States Code, Section 844(i), and did thereafter perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of said unlawful activity in that Sean Slater traveled from New York to Massachusetts to maliciously damage and destroy and attempt to damage and destroy, by means of fire and an explosive, a building used in interstate commerce and engaged in an activity affecting interstate commerce located at 178 Main Street in North Reading, Massachusetts which housed two business establishments in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

RACKETEERING ACT NUMBER SIXTEEN  
(Money Laundering - Slater bail)

28. On or about November 22, 2003, in the District of Massachusetts, the defendants **DENNIS ALBERTELLI** and **DEEB HOMSI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the posting of \$5,000 cash bail at the detention facility at Cambridge District Court for Sean Slater knowing that the transactions were designed in whole or in part to conceal and

disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

RACKETEERING ACT NUMBER SEVENTEEN  
(Conspiracy and attempt to commit extortion - McCarthy's)

29. The defendant named below committed the following acts involving extortion, the commission of any one of which constitutes the commission of Racketeering Act #17.

a. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

b. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the

shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

RACKETEERING ACT NUMBER EIGHTEEN  
(Conspiracy and attempt to commit extortion - Clarke's)

30. The defendant named below committed the following acts involving extortion, the commission of any one of which constitutes the commission of Racketeering Act #18.

a. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

b. From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did attempt to affect



commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in violation of Title 18, United States Code, Section 1951.

RACKETEERING ACT NUMBER NINETEEN  
(Money Laundering - Mazzei)

31. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts, the defendants **ARTHUR GIANELLI** and **DENNIS ALBERTELLI** aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders payable to Daniele Mazzei in the approximate aggregate amount of \$19,000 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful

activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>
(1)	9/30/2002	\$600.00	4412670197
(2)	9/30/2002	\$700.00	4412670175
(3)	9/30/2002	\$700.00	4412670186
(4)	11/1/2002	\$600.00	4412674686
(5)	11/1/2002	\$700.00	4412674664
(6)	11/1/2002	\$700.00	4412674675
(7)	1/29/2003	\$700.00	4415762968
(8)	1/29/2003	\$700.00	4415762946
(9)	1/29/2003	\$1,000.00	5034010454
(10)	1/29/2003	\$1,000.00	5034010443
(11)	4/28/2003	\$1,000.00	5558954591
(12)	4/28/2003	\$1,000.00	5558954580
(13)	6/25/2003	\$1,000.00	5558965751
(14)	6/25/2003	\$1,000.00	5558965740
(15)	8/26/2003	\$800.00	5456564762
(16)	8/26/2003	\$800.00	5356564751
(17)	8/26/2003	\$800.00	5356564740
(18)	9/30/2003	\$600.00	5778038711
(19)	9/30/2003	\$1,000.00	5778038698
(20)	9/30/2003	\$1,000.00	5778038700
(21)	11/28/2003	\$600.00	6246618614
(22)	11/28/2003	\$1,000.00	6246618603
(23)	11/28/2003	\$1,000.00	6246618592

RACKETEERING ACT NUMBER TWENTY  
(Money Laundering - Sports Zone, Inc.)

32. From in or about and between July and August 2002, in the District of Massachusetts, the defendant **ARTHUR GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit,

the investment of said proceeds in Sports Zone, Inc. in the approximate aggregate amount of \$200,000 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
7/7/2002	Cash	\$25,000
8/8/2002	Check	\$100,000
8/26/2002	Cash	\$75,000

RACKETEERING ACT NUMBER TWENTY-ONE  
(Money Laundering - C&L Management)

33. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the deposit of said proceeds in Sovereign Bank account number 41004947572 held in the name of Christine A.

Leone d/b/a C&L Management in the approximate aggregate amount of \$106,890 as specifically set forth in the subpredicate racketeering acts below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
(1)	6/23/2004	Cash	\$5,000.00
(2)	6/25/2004	Cash	\$5,000.00
(3)	6/29/2004	Cash	\$5,000.00
(4)	7/14/2004	Cash	\$1,000.00
(5)	7/20/2004	Cash	\$6,500.00
(6)	8/4/2004	Cash	\$5,000.00
(7)	8/9/2004	Cash	\$9,000.00
(8)	8/11/2004	Cash	\$8,950.00
(9)	8/12/2004	Cash	\$6,200.00
(10)	9/2/2004	Cash	\$9,000.00
(11)	9/14/2004	Cash	\$5,500.00
(12)	9/22/2004	Cash	\$5,400.00
(13)	9/29/2004	Cash	\$5,700.00
(14)	10/15/2004	Cash	\$5,000.00
(15)	10/25/2004	Cash	\$150.00
(16)	11/16/2004	Cash	\$2,940.00
(17)	11/18/2004	Cash	\$7,400.00
(18)	12/15/2004	Cash	\$7,500.00
(19)	12/17/2004	Cash	\$2,150.00
(20)	12/23/2004	Cash	\$4,500.00

RACKETEERING ACT NUMBER TWENTY-TWO  
(Money Laundering - O'Connor)

34. From in or about August 2001 and continuing until in or

about September 2003, in the District of Massachusetts and elsewhere, the defendant **DENNIS ALBERTELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks made payable to Dennele Transportation in the approximate aggregate amount of \$97,049 as specifically set forth in the subpredicate racketeering acts below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

	<u>Date</u>	<u>Check</u>	<u>Amount</u>
(1)	8/22/2001	762	\$50,000.00
(2)	5/5/2003	1013	\$17,385.00
(3)	5/5/2003	1014	\$21,280.00
(4)	5/6/2003	1015	\$8,384.00

RACKETEERING ACT NUMBER TWENTY-THREE  
(Money Laundering - American Home Builders)

35. The defendants named below committed the following acts involving money laundering, the commission of any one of which constitutes the commission of Racketeering Act #23.

a. From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants **JOSEPH YERARDI, JR., RAFIA FEGHI A/K/A RAFIA YERARDI,** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of loansharking activity in violation of Title 18, United States Code, Section 891, et seq., knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal loansharking activity, in violation of Section 1956(h) of Title 18 of the United States Code.

b. From in or before 1999 and continuing until in or about March 2004, in the District of Massachusetts and elsewhere, the defendants **JOSEPH YERARDI, JR., and RAFIA FEGHI A/K/A RAFIA YERARDI,** aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of loansharking

activity in violation of Title 18, United States Code, Section 891, et seq., to wit, the negotiation of checks drawn on the account of American Home Builders in the approximate aggregate amount of \$23,200 as specifically set forth in the subpredicate racketeering acts below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(1)	3/16/1998	10510	\$200.00
(2)	4/2/1998	10556	\$300.00
(3)	4/10/1998	10584	\$200.00
(4)	4/16/1998	10615	\$300.00
(5)	5/28/1998	10772	\$300.00
(6)	06/1998	10792	\$200.00
(7)	6/18/1998	10836	\$200.00
(8)	6/26/1998	10876	\$200.00
(9)	7/20/1998	10972	\$200.00
(10)	8/20/1998	11083	\$200.00
(11)	9/2/1998	11147	\$300.00
(12)	9/16/1998	11187	\$200.00
(13)	9/23/1998	11217	\$200.00
(14)	10/22/1998	11293	\$200.00
(15)	11/19/1998	11386	\$100.00
(16)	11/24/1998	11407	\$200.00
(17)	12/17/1998	11484	\$200.00
(18)	1/21/1999	11569	\$200.00
(19)	2/4/1999	11615	\$200.00
(20)	3/2/1999	11688	\$200.00
(21)	4/7/1999	11792	\$200.00
(22)	4/21/1999	11863	\$300.00
(23)	5/5/1999	11935	\$200.00
(24)	5/20/1999	11994	\$200.00

(25)	6/3/1999	12061	\$200.00
(26)	6/15/1999	12120	\$200.00
(27)	6/25/1999	12171	\$200.00
(28)	7/14/1999	12265	\$200.00
(29)	7/27/1999	12358	\$200.00
(30)	8/4/1999	12336	\$200.00
(31)	8/6/1999	12422	\$200.00
(32)	9/9/1999	12557	\$200.00
(33)	9/16/1999	12586	\$200.00
(34)	9/29/1999	12635	\$200.00
(35)	10/13/1999	12685	\$200.00
(36)	10/27/1999	12741	\$200.00
(37)	11/10/1999	12783	\$200.00
(38)	11/23/1999	12847	\$200.00
(39)	12/1/1999	12871	\$200.00
(40)	12/8/1999	12899	\$200.00
(41)	1/19/2000	13059	\$200.00
(42)	02/2000	13090	\$200.00
(43)	3/3/2000	13251	\$200.00
(44)	3/15/2000	13317	\$300.00
(45)	3/22/2000	13361	\$200.00
(46)	4/5/2000	13427	\$200.00
(47)	4/19/2000	13492	\$200.00
(48)	5/10/2000	13688	\$200.00
(49)	5/17/2000	13725	\$200.00
(50)	6/7/2000	13795	\$200.00
(51)	6/14/2000	13822	\$200.00
(52)	6/21/2000	13839	\$200.00
(53)	7/12/2000	13943	\$200.00
(54)	8/2/2000	14005	\$200.00
(55)	8/16/2000	14080	\$200.00
(56)	8/22/2000	14233	\$400.00
(57)	9/27/2000	14244	\$200.00
(58)	10/4/2000	14270	\$200.00
(59)	11/30/2000	14445	\$200.00
(60)	1/10/2001	14573	\$200.00
(61)	1/25/2001	14609	\$200.00
(62)	1/31/2001	14636	\$200.00
(63)	2/11/2001	14674	\$200.00



(64)	4/4/2001	14816	\$200.00
(65)	4/12/2001	14853	\$200.00
(66)	5/2/2001	14932	\$200.00
(67)	6/14/2001	15064	\$200.00
(68)	6/20/2001	15084	\$200.00
(69)	6/23/2001	15005	\$200.00
(70)	7/3/2001	15117	\$200.00
(71)	7/25/2001	15186	\$200.00
(72)	8/29/2001	15291	\$200.00
(73)	9/6/2001	15319	\$200.00
(74)	10/24/2001	15478	\$200.00
(75)	1/23/2002	16345	\$200.00
(76)	2/20/2002	16438	\$200.00
(77)	2/27/2002	16455	\$200.00
(78)	04/2002	16653	\$200.00
(79)	4/17/2002	16614	\$200.00
(80)	5/8/2002	16663	\$200.00
(81)	5/15/2002	16692	\$200.00
(82)	5/23/2002	16726	\$200.00
(83)	5/29/2002	16742	\$200.00
(84)	6/19/2002	16796	\$200.00
(85)	7/3/2002	16850	\$200.00
(86)	7/31/2002	16916	\$200.00
(87)	9/6/2002	17016	\$200.00
(88)	9/21/2002	17081	\$200.00
(89)	10/11/2002	17135	\$200.00
(90)	10/18/2002	17150	\$200.00
(91)	10/28/2002	17170	\$200.00
(92)	11/8/2002	17243	\$200.00
(93)	3/21/2003	17581	\$200.00
(94)	3/28/2003	17602	\$200.00
(95)	4/18/2003	17662	\$200.00
(96)	4/25/2003	17684	\$200.00
(97)	5/23/2003	17792	\$300.00
(98)	6/6/2003	17848	\$200.00
(99)	6/13/2003	17868	\$200.00
(100)	6/28/2003	17915	\$200.00
(101)	8/8/2003	18072	\$200.00
(102)	8/14/2003	18099	\$200.00

(103)	9/19/2003	18205	\$200.00
(104)	10/10/2003	18287	\$400.00
(105)	10/24/2003	18333	\$200.00
(106)	11/7/2003	18380	\$200.00
(107)	12/19/2003	18491	\$200.00
(108)	1/9/2004	18565	\$200.00
(109)	1/23/2004	18604	\$200.00
(110)	3/5/2004	18740	\$200.00
(111)	3/12/2004	18788	\$200.00

COLLECTION OF UNLAWFUL DEBT

36. The collection of unlawful debt as defined by Title 18, United States Code, Section 1961(6), that is, a debt (A) incurred or contracted in gambling activity which was in violation of the law of the United States or the law of the Commonwealth of Massachusetts, or which was unenforceable in whole or in part as to principal or interest because of the laws relating to usury, and (B) which was incurred in connection with the business of gambling in violation of the law of the United States or the law of the Commonwealth of Massachusetts, or the business of lending money or a thing of value at a rate usurious under state or federal law, where the usurious rate was at least twice the enforceable rate, through which the defendants agreed to conduct and participate in the affairs of the enterprise, consisted of multiple acts of collecting and attempting to collect and aiding and abetting in the collection and attempted collection of usurious loans and gambling debts as follows:

(a) From in or before 1999 and continuing until in or about

June 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Thomas Baker.

(b) From in or before 1999 and continuing until in or about January 2005, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Paul Magliozzi.

(c) From in or before 1999 and continuing until in or about June 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Michael Goudie.

(d) From in or before 1999 and continuing until in or about April 2005, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Philip Puopolo.

(e) From in or before 1999 and continuing until in or about September 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Dennis Willcox.

(f) From in or before September 2000 and continuing until in or about January 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from John Mousis.

(g) From in or before 1999 and continuing until in or about February 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from John Pappas.

(h) From in or before 1999 and continuing until in or about June 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Ronald Ohanian.

(i) From in or before 1999 and continuing until in or about April 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from Francis Murray.

(j) From in or before 1999 and continuing until in or about November 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of

unlawful gambling debts from Leonard Teperow.

(k) From in or before 1999 and continuing until in or about April 2005, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful gambling debts from John Croshaw.

(l) From in or before 1999 and continuing until in or about August 2004, the defendants **JOSEPH YERARDI, JR., RAFIA FEGHI A/K/A RAFIA YERARDI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debt from Frank Murphy.

(m) From in or before late 2003 and continuing until in or about early 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debts from Thomas Baker.

(n) From in or before August 2002 and continuing until in or about November 2004, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, participated in the collection and attempted collection of unlawful usurious debts from John Mousis.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO  
(Racketeering)

1. Paragraphs One through Ten of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants herein,

ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI,  
RANDY ALBERTELLI,  
GISELE ALBERTELLI,  
RAFIA FEGHI A/K/A RAFIA YERARDI,  
TONY DANIELS  
FRANK IACABONI,  
DEEB HOMSI,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ, and  
WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.,

and others, known and unknown to the Grand Jury, being persons employed by and associated with the unlawful enterprise, did unlawfully and knowingly conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise, which was engaged in and the activities of which affected interstate and foreign commerce, through the pattern of racketeering activity particularly described in paragraphs 13-35 of Count One and collection of unlawful debt set forth in paragraph 36 of Count One, the contents of which are incorporated

by reference as though fully set forth herein.

All in violation of Title 18, United States Code, Section 1962(c) and Section 2.

COUNT THREE  
(Illegal Gambling Business - Sports Betting)

From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants

ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI,  
RANDY ALBERTELLI,  
FRANK IACABONI,  
TONY DANIELS,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ, and  
WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.,

aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: a sports betting business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

In violation of Title 18, United States Code, Sections 1955 and 2.



COUNT FOUR  
(Illegal Gambling Business - Electronic Gaming Machines)

From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI, and  
SALVATORE RAMASCI,**

aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: the illegal operation of electronic gaming machines which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

In violation of Title 18, United States Code, Sections 1955 and 2.

COUNT FIVE  
(Illegal Gambling Business - Football Cards)

From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants

DENNIS ALBERTELLI,  
RANDY ALBERTELLI,  
GISELE ALBERTELLI,  
ARTHUR GIANELLI, and  
FRANK IACABONI,

aided and abetted by others known and unknown to the grand jury, conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business to wit: a football card business which constituted a violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 5, 5A, 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts) which involved five or more persons who conducted all or part of such business and which had been in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

In violation of Title 18, United States Code, Sections 1955 and 2.

COUNT SIX

(Use of Wire Communication Facility - Telephone)

In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants

ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI,  
RANDY ALBERTELLI,  
TONY DANIELS,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ, and  
WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.,

aided and abetted by others known and unknown to the Grand Jury, being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants provided the use of a toll-free telephone line to an offshore gaming office located in San Jose, Costa Rica for the purpose of placing wagers on sporting events.

In violation of Title 18, United States Code, Sections 1084 and 2.

COUNT SEVEN

(Use of Wire Communication Facility - Internet)

In or about and between July 2003 and April 2005, in the District of Massachusetts and elsewhere, the defendants

ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI,  
RANDY ALBERTELLI,  
TONY DANIELS,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ, and  
WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.,

aided and abetted by others known and unknown to the Grand Jury, being engaged in the business of betting and wagering, knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers and information assisting in the placing of bets and wagers on any sporting event and contest, and for the transmission of a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, namely, the defendants provided an internet site located in San Jose, Costa Rica for the purpose of placing wagers on sporting events.

In violation of Title 18, United States Code, Sections 1084 and 2.

COUNT EIGHT  
(Money Laundering Conspiracy)

From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI,**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

a. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI,** and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **RAFIA FEGHI A/K/A RAFIA YERARDI** in the form of cash and postal money orders. The

postal money orders aggregated approximately \$114,600.

b. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **JOSEPH YERARDI, JR.** in the form of postal money orders deposited into **YERARDI's** prison "canteen" account. Other postal money orders which represented the proceeds of the illegal gambling business were sent to prison canteen accounts of other inmates designated by **YERARDI**. Further, postal money orders which represented the proceeds of the illegal gambling business were forwarded at **YERARDI's** direction to other members of **YERARDI's** family. These postal money orders aggregated approximately \$74,300.

c. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI, GISELE ALBERTELLI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendant **ARTHUR GIANELLI** by exchanging cash for checks payable to **GIANELLI's** wife, Mary Ann. The checks were drawn on the business accounts of two businesses with which the defendants **DENNIS ALBERTELLI** and **GISELE ALBERTELLI** were associated. The checks were drawn to make it appear as though Mary Ann Gianelli had a legitimate source of income and that the payments to Mary Ann Gianelli were legitimate business expenses. These checks

aggregated approximately \$238,385.

d. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI, TONY DANIELS**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to the defendants **TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ**, and **WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.** The defendant **DANIELS** converted cash proceeds of the illegal gambling business to checks which he forwarded to Cypress Escrow located in Nevis, West Indies to pay the defendants **TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ**, and **WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.** for services provided to the Gianelli Group. These checks aggregated approximately \$37,419.

e. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille. This investment was made through payments in cash and checks used for multiple purposes related to the business of The Big Dog Sports Grille. The cash and checks aggregated approximately \$705,700.

f. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, invested proceeds of the illegal gambling business in Sports

Zone, Inc. This investment was made through payments in cash and checks used for multiple purposes related to the business of Sports Zone, Inc. The cash and checks aggregated approximately \$200,000.

g. It was a part of the conspiracy that the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, SALVATORE RAMASCI**, and others known and unknown to the grand jury, distributed proceeds of the illegal gambling business to **GIANELLI**'s paramour Daniele Mazzei in the form of cash and postal money orders. The postal money orders aggregated approximately \$25,600.

h. It was a part of the conspiracy that the defendant **ARTHUR GIANELLI**, and others known and unknown to the grand jury, deposited proceeds of the illegal gambling business into Sovereign Bank account number 41004947572 held in the name of Christine A. Leone d/b/a C&L Management. **GIANELLI** used this account to pay his personal expenses among other things. Cash deposits made to this account aggregated approximately \$106,890.

All in violation of Section 1956(h) of Title 18 of the United States Code.



COUNT NINE

(Money Laundering Conspiracy - Rafia Feghi)

From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**JOSEPH YERARDI, JR.,  
RAFIA FEGHI A/K/A RAFIA YERARDI,**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Ten through Eighty-six which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

COUNTS TEN THROUGH EIGHTY-SIX  
(Money Laundering - Rafia Feghi)

From in or about August 2002 and continuing until in or about November 2003, in the District of Massachusetts and elsewhere, the defendants

ARTHUR GIANELLI,  
JOSEPH YERARDI, JR.,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI, and  
RAFIA FEGHI A/K/A RAFIA YERARDI,

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$77,000 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>	<u>Payee</u>
(10)	8/31/2002	\$1,000.00	4906103477	Belmont Hill School
(11)	9/8/2002	\$1,000.00	5993558616	American Express
(12)	9/11/2002	\$1,000.00	5993562317	American Express
(13)	9/18/2002	\$1,000.00	4906105852	FCNB

(14)	9/27/2002	\$1,000.00	5017442365	Archstone Bearhill
(15)	9/28/2002	\$1,000.00	4906109520	Belmont Hill School
(16)	9/28/2002	\$1,000.00	4906109542	Belmont Hill School
(17)	10/10/2002	\$1,000.00	5017270713	MBNA America
(18)	10/25/2002	\$1,000.00	4906106662	American Express
(19)	10/31/2002	\$1,000.00	4906119341	American Express
(20)	11/8/2002	\$1,000.00	5019283203	Belmont Hill School
(21)	11/8/2002	\$1,000.00	5019283192	Belmont Hill School
(22)	11/16/2002	\$1,000.00	5017194900	FCNB
(23)	11/19/2002	\$1,000.00	4627804230	American Express
(24)	11/25/2002	\$1,000.00	5019319618	American Express
(25)	12/5/2002	\$1,000.00	5246731271	American Express
(26)	12/10/2002	\$1,000.00	5246731495	American Express
(27)	12/10/2002	\$1,000.00	5019295105	Belmont Hill School
(28)	12/10/2002	\$1,000.00	5019295116	Belmont Hill School
(29)	12/21/2002	\$1,000.00	4906124302	Rafia Feghi
(30)	12/24/2002	\$1,000.00	5254609151	American Express
(31)	12/30/2002	\$1,000.00	5254608745	American Express
(32)	1/9/2003	\$1,000.00	5017066762	American Express
(33)	1/16/2003	\$1,000.00	5254709692	Belmont Hill School
(34)	1/16/2003	\$1,000.00	5254709681	Belmont Hill School
(35)	1/27/2003	\$1,000.00	5013507003	American Express
(36)	2/6/2003	\$1,000.00	5013505473	American Express
(37)	2/11/2003	\$1,000.00	5254623246	Yossef Bina
(38)	2/19/2003	\$1,000.00	5254614551	Yossef Bina
(39)	2/25/2003	\$1,000.00	5246747482	American Express
(40)	2/25/2003	\$1,000.00	5013513540	Belmont Hill School
(41)	2/25/2003	\$1,000.00	5013513551	Belmont Hill School
(42)	3/12/2003	\$1,000.00	5013516205	American Express
(43)	3/18/2003	\$1,000.00	5255791481	Yossef Bina
(44)	3/27/2003	\$1,000.00	5254646411	Rafia Feghi
(45)	4/2/2003	\$1,000.00	5254626194	Belmont Hill School
(46)	4/2/2003	\$1,000.00	5254626205	Belmont Hill School
(47)	4/8/2003	\$1,000.00	5256529097	Rafia Feghi
(48)	4/14/2003	\$1,000.00	5013520233	Belmont Hill School
(49)	4/14/2003	\$1,000.00	5013520244	Green Point Mortgage
(50)	4/16/2003	\$1,000.00	5666179353	Belmont Hill School
(51)	4/22/2003	\$1,000.00	5666183638	Green Point Mortgage
(52)	4/30/2003	\$1,000.00	5666187150	Rafia Feghi
(53)	5/6/2003	\$1,000.00	5559229484	American Express
(54)	5/23/2003	\$1,000.00	5666940551	Green Point Mortgage

(55)	5/27/2003	\$1,000.00	5666515773	Rafia Feghi
(56)	6/7/2003	\$1,000.00	5667307110	American Express
(57)	6/12/2003	\$1,000.00	5666179948	American Express
(58)	6/20/2003	\$1,000.00	5666523884	Fidelity
(59)	6/26/2003	\$1,000.00	5666185563	Fidelity
(60)	7/3/2003	\$1,000.00	5666957414	American Express
(61)	7/12/2003	\$1,000.00	5246754952	American Express
(62)	7/21/2003	\$1,000.00	5559245853	Belmont Hill School
(63)	7/21/2003	\$1,000.00	5559245864	Belmont Hill School
(64)	7/26/2003	\$1,000.00	5992269197	American Express
(65)	8/8/2003	\$1,000.00	5993553780	American Express
(66)	8/14/2003	\$1,000.00	5667314073	Washington Mutual
(67)	8/22/2003	\$1,000.00	5994372262	Belmont Hill School
(68)	8/22/2003	\$1,000.00	5994372251	Belmont Hill School
(69)	8/22/2003	\$1,000.00	5666198883	Rafia Feghi
(70)	8/29/2003	\$1,000.00	5993558256	Rafia Feghi
(71)	9/15/2003	\$1,000.00	5993563498	Rafia Feghi
(72)	9/25/2003	\$1,000.00	5881185303	Belmont Hill School
(73)	9/25/2003	\$1,000.00	5881185314	Belmont Hill School
(74)	9/25/2003	\$1,000.00	5993561788	Washington Mutual
(75)	10/1/2003	\$1,000.00	5992622436	Rafia Feghi
(76)	10/11/2003	\$1,000.00	5881189601	American Express
(77)	10/16/2003	\$1,000.00	5992626183	Washington Mutual
(78)	10/22/2003	\$1,000.00	6244176846	Belmont Hill School
(79)	10/22/2003	\$1,000.00	6244176857	Belmont Hill School
(80)	10/22/2003	\$1,000.00	6245769363	Belmont Hill School
(81)	10/22/2003	\$1,000.00	6245769374	Washington Mutual
(82)	11/3/2003	\$1,000.00	6245773762	American Express
(83)	11/5/2003	\$1,000.00	6245854020	American Express
(84)	11/12/2003	\$1,000.00	5881194235	Rafia Feghi
(85)	11/21/2003	\$1,000.00	6245748393	Belmont Hill School
(86)	11/21/2003	\$1,000.00	6244191516	Belmont Hill School

All in violation of Title 18, United States Code, Sections  
1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

COUNT EIGHTY-SEVEN  
(Money Laundering Conspiracy - Joseph Yerardi, Jr.)

From in or before 1999 and continuing until in or about April 2005, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant

**JOSEPH YERARDI, JR.**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Eighty-eight through One Hundred Eighty-five which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

COUNTS EIGHTY-EIGHT THROUGH ONE HUNDRED EIGHTY-FIVE  
(Money Laundering - Joseph Yerardi, Jr.)

From in or about August 2002 and continuing until in or about July 2003, in the District of Massachusetts and elsewhere, the defendants **ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI**, and **SALVATORE RAMASCI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders in the approximate aggregate amount of \$52,050 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>	<u>Payee</u>
(88)	8/31/2002	\$500.00	4412546853	Elizabeth Yerardi
(89)	8/31/2002	\$300.00	4906103455	FCI Raybrook
(90)	8/31/2002	\$500.00	4412546864	FCI Raybrook
(91)	9/8/2002	\$300.00	5993558638	FCI McKean
(92)	9/8/2002	\$500.00	5993558627	Linda Yerardi
(93)	9/11/2002	\$500.00	5993562328	Linda Yerardi
(94)	9/18/2002	\$600.00	5017441476	Elizabeth Yerardi
(95)	9/27/2002	\$600.00	5017442376	Elizabeth Yerardi
(96)	10/22/2002	\$300.00	5017453367	FCI McKean

(97)	11/5/2002	\$300.00	4630588470	Linda Yerardi
(98)	11/5/2002	\$700.00	4630588468	Linda Yerardi
(99)	11/16/2002	\$1,000.00	5017194911	Linda Yerardi
(100)	11/19/2002	\$500.00	4627804241	FCI Raybrook
(101)	11/19/2002	\$1,000.00	4627804228	Linda Yerardi
(102)	11/21/2002	\$300.00	5019285328	FCI Raybrook
(103)	11/23/2002	\$300.00	4630587772	FCI Raybrook
(104)	11/25/2002	\$300.00	5019319631	FCI Raybrook
(105)	11/25/2002	\$1,000.00	5019319620	Linda Yerardi
(106)	11/26/2002	\$400.00	4630579582	Alissa Yerardi
(107)	12/4/2002	\$1,000.00	5017459511	Linda Yerardi
(108)	12/10/2002	\$1,000.00	5017459803	Jos. & Eliz. Yerardi
(109)	12/10/2002	\$500.00	5019295138	Joseph Yerardi Sr
(110)	12/10/2002	\$1,000.00	5246731506	Linda Yerardi
(111)	12/21/2002	\$300.00	4906124335	FCI Raybrook
(112)	12/21/2002	\$1,000.00	4906124313	Linda Yerardi
(113)	12/24/2002	\$300.00	5254609116	FCI Raybrook
(114)	12/30/2002	\$1,000.00	5254608734	Linda Yerardi
(115)	1/9/2003	\$500.00	5017066773	Alissa Yerardi
(116)	1/9/2003	\$1,000.00	5017066751	Linda Yerardi
(117)	1/21/2003	\$300.00	4630594961	Linda Yerardi
(118)	1/21/2003	\$700.00	4630594950	Linda Yerardi
(119)	1/27/2003	\$300.00	4630596963	FCI Raybrook
(120)	1/29/2003	\$300.00	5254616417	FCI Raybrook
(121)	1/29/2003	\$1,000.00	5254616406	Linda Yerardi
(122)	1/30/2003	\$300.00	5246743307	FCI Raybrook
(123)	2/6/2003	\$200.00	5246742690	Alissa Yerardi
(124)	2/6/2003	\$400.00	5246742677	Alissa Yerardi
(125)	2/6/2003	\$500.00	5013505506	Alissa Yerardi
(126)	2/6/2003	\$1,000.00	5013505484	Linda Yerardi
(127)	2/11/2003	\$1,000.00	5254623257	Linda Yerardi
(128)	2/19/2003	\$1,000.00	5254614540	Linda Yerardi
(129)	2/25/2003	\$1,000.00	5246747493	Linda Yerardi
(130)	3/4/2003	\$300.00	5246750564	FCI Raybrook
(131)	3/5/2003	\$1,000.00	5246747820	Joseph Yerardi
(132)	3/12/2003	\$500.00	5013516216	Alissa Yerardi
(133)	3/12/2003	\$300.00	5256522000	FCI Raybrook
(134)	3/12/2003	\$1,000.00	5254726994	Linda Yerardi
(135)	3/13/2003	\$300.00	5254628128	FCI Raybrook
(136)	3/18/2003	\$1,000.00	5255791492	Linda Yerardi
(137)	3/27/2003	\$1,000.00	5254646400	Linda Yerardi
(138)	3/31/2003	\$300.00	4630932022	Linda Yerardi
(139)	3/31/2003	\$700.00	4630932011	Linda Yerardi
(140)	4/8/2003	\$1,000.00	5256529108	Linda Yerardi
(141)	4/14/2003	\$200.00	5013520277	Alissa Yerardi
(142)	4/14/2003	\$200.00	5013520255	Elizabeth Yerardi
(143)	4/16/2003	\$500.00	5666179342	Alissa Yerardi



(144)	5/6/2003	\$200.00	5559229528	Elizabeth Yerardi
(145)	5/6/2003	\$200.00	5559229517	Elizabeth Yerardi
(146)	5/8/2003	\$500.00	5666515312	Alissa Yerardi
(147)	5/23/2003	\$500.00	5666940562	Linda Yerardi
(148)	5/27/2003	\$500.00	5666515784	Linda Yerardi
(149)	6/2/2003	\$500.00	5559236853	Alissa Yerardi
(150)	6/7/2003	\$500.00	5667307132	Linda Yerardi
(151)	6/12/2003	\$500.00	5666179961	Linda Yerardi
(152)	6/20/2003	\$500.00	5666523906	Linda Yerardi
(153)	6/26/2003	\$500.00	5666185585	Linda Yerardi
(154)	7/3/2003	\$500.00	5666957436	Linda Yerardi
(155)	7/12/2003	\$500.00	5246754974	Linda Yerardi
(156)	7/16/2003	\$500.00	5559245583	Linda Yerardi
(157)	7/26/2003	\$500.00	5992269210	Linda Yerardi
(158)	8/2/2003	\$500.00	4630940335	Alissa Yerardi
(159)	8/2/2003	\$500.00	4630940324	Linda Yerardi
(160)	8/8/2003	\$500.00	5993553936	Linda Yerardi
(161)	8/14/2003	\$500.00	5559248992	FCI McKean
(162)	8/14/2003	\$500.00	5667314084	Linda Yerardi
(163)	8/22/2003	\$500.00	5666198905	Linda Yerardi
(164)	8/29/2003	\$500.00	5993558280	Alissa Yerardi
(165)	8/29/2003	\$300.00	5992617262	FCI McKean
(166)	8/29/2003	\$500.00	5993558278	Linda Yerardi
(167)	8/30/2003	\$300.00	5881179374	FCI McKean
(168)	9/15/2003	\$500.00	5993563500	Linda Yerardi
(169)	9/25/2003	\$500.00	5993561801	Linda Yerardi
(170)	10/1/2003	\$500.00	5992622458	Alissa Yerardi
(171)	10/1/2003	\$300.00	5992622460	FCI McKean
(172)	10/9/2003	\$300.00	5993560528	FCI McKean
(173)	10/11/2003	\$300.00	5881189612	FCI McKean
(174)	10/22/2003	\$300.00	6245769385	FCI McKean
(175)	11/5/2003	\$500.00	6245854031	Alissa Yerardi
(176)	11/5/2003	\$300.00	6245854042	FCI McKean
(177)	11/6/2003	\$300.00	6244177320	FCI McKean
(178)	11/12/2003	\$300.00	5881194246	FCI McKean
(179)	12/3/2003	\$700.00	6245780332	Alissa Yerardi
(180)	12/3/2003	\$300.00	6245780343	FCI McKean
(181)	12/10/2003	\$500.00	6245783032	Alissa Yerardi
(182)	12/10/2003	\$550.00	6245783043	Alissa Yerardi
(183)	12/10/2003	\$300.00	6245783021	FCI McKean
(184)	12/17/2003	\$300.00	6245863694	FCI McKean
(185)	07/03/2003	\$500.00	5666957425	Alissa Yerardi

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.



COUNT ONE HUNDRED EIGHTY-SIX  
(Money Laundering Conspiracy - Dennele Transportation)

From in or about May 2000 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant

**GISELE ALBERTELLI**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts One Hundred Eighty-seven through Two Hundred Thirty-four which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

COUNTS ONE HUNDRED EIGHTY-SEVEN THROUGH TWO HUNDRED THIRTY-FOUR  
(Money Laundering - Dennele Transportation)

From in or about May 2000 and continuing until in or about February 2004, in the District of Massachusetts, the defendants

**ARTHUR GIANELLI,**  
**DENNIS ALBERTELLI, and**  
**GISELE ALBERTELLI,**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks drawn on the account of Dennele Transportation and made payable to Mary Ann Gianelli in the approximate aggregate amount of \$129,000 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(187)	5/18/2000	1366	\$630.00
(188)	6/1/2000	1380	\$650.00
(189)	7/6/2000	1424	\$630.00
(190)	8/3/2000	1464	\$630.00
(191)	9/7/2000	1503	\$630.00
(192)	10/5/2000	1551	\$630.00

(193)	11/2/2000	1558	\$630.00
(194)	12/7/2000	1640	\$630.00
(195)	1/4/2001	1678	\$630.00
(196)	2/1/2001	1709	\$630.00
(197)	3/1/2001	1754	\$630.00
(198)	4/5/2001	1811	\$630.00
(199)	5/3/2001	1858	\$630.00
(200)	6/7/2001	1902	\$630.00
(201)	7/5/2001	1939	\$630.00
(202)	8/2/2001	1976	\$630.00
(203)	8/20/2001	2010	\$50,000.00
(204)	9/6/2001	2027	\$630.00
(205)	10/4/2001	2067	\$630.00
(206)	11/1/2001	2104	\$630.00
(207)	12/6/2001	2151	\$630.00
(208)	1/3/2002	2186	\$630.00
(209)	2/7/2002	2236	\$630.00
(210)	3/7/2002	2284	\$630.00
(211)	4/4/2002	2314	\$630.00
(212)	5/13/2002	2368	\$630.00
(213)	6/6/2002	2401	\$630.00
(214)	7/5/2002	2446	\$630.00
(215)	8/1/2002	2479	\$630.00
(216)	9/5/2002	2522	\$630.00
(217)	10/3/2002	2566	\$630.00
(218)	11/7/2002	2620	\$630.00
(219)	12/5/2002	2651	\$630.00
(220)	1/2/2003	2695	\$630.00
(221)	2/20/2003	2779	\$630.00
(222)	3/6/2003	2781	\$630.00
(223)	4/3/2003	2840	\$630.00
(224)	5/1/2003	2883	\$630.00
(225)	5/13/2003	2908	\$50,000.00
(226)	6/19/2003	2958	\$630.00
(227)	7/3/2003	2977	\$630.00
(228)	8/7/2003	3025	\$630.00
(229)	9/4/2003	3062	\$630.00
(230)	10/2/2003	3108	\$630.00
(231)	11/6/2003	3153	\$630.00
(232)	12/4/2003	3181	\$630.00
(233)	1/1/2004	3216	\$630.00
(234)	2/5/2004	3245	\$630.00

All in violation of Title 18, United States Code, Sections  
1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

COUNT TWO HUNDRED THIRTY-FIVE  
(Money Laundering Conspiracy - Tony Daniels)

From in or about October 2003 and continuing until in or about February 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants

**TONY DANIELS,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ,  
WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.**

and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Two Hundred Thirty-six through Two Hundred Thirty-eight which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal gambling activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

COUNTS TWO HUNDRED THIRTY-SIX THROUGH TWO HUNDRED THIRTY-EIGHT  
(Money Laundering - Tony Daniels)

From in or before 1999 and continuing until in or about April 2005, in the District of Massachusetts and elsewhere, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
TONY DANIELS,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ, and  
WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.,**

aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the conversion of cash to bank checks made payable to Cypress Escrow and subsequent negotiation of said checks intended to pay for services provided to the Gianelli Group by the defendants **TODD WESTERMAN, ENEYDA GONZALEZ RODRIGUEZ, and WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A.** in the approximate aggregate amount of \$37,419 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful

activity.

<u>Count</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
(236)	10/14/2003	637628	\$6,200.00
(237)	10/15/2003	3859	\$12,400.00
(238)	2/19/2004	672480	\$18,819.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

COUNTS TWO HUNDRED THIRTY-NINE THROUGH TWO HUNDRED SEVENTY-TWO  
(Money Laundering - The Big Dog)

From in or before June 1999 and continuing until in or about April 2003, in the District of Massachusetts, the defendants **ARTHUR GIANELLI, DENNIS ALBERTELLI, and SALVATORE RAMASCI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the investment of said proceeds in The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille and The Big Dog Realty Trust in the approximate aggregate amount of \$593,332 as specifically set forth below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count</u>	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
(239)	8/7/2000	Cash Deposit	\$27,000.00
(240)	9/21/2000	Cash Deposit	\$30,000.00
(241)	11/5/2000	Cash Deposit	\$25,000.00
(242)	12/4/2000	Cash Deposit	\$25,000.00
(243)	12/18/2000	Cash Deposit	\$20,000.00
(244)	7/11/2001	Coach Lane Realty Trust	\$5,204.00
(245)	7/16/2001	Coach Lane Realty Trust	\$75,000.00
(246)	8/9/2001	Coach Lane Realty Trust	\$5,250.00
(247)	10/13/2001	Coach Lane Realty Trust	\$7,956.00
(248)	11/14/2001	Coach Lane Realty Trust	\$5,250.00
(249)	12/28/2001	Coach Lane Realty Trust	\$5,250.00

(250)	2/15/2002	Coach Lane Realty Trust	\$5,250.00
(251)	4/18/2002	Coach Lane Realty Trust	\$5,250.00
(252)	4/24/2002	Regnante Sterio & Osborne	\$2,925.00
(253)	5/15/2002	Coach Lane Realty Trust	\$5,250.00
(254)	5/27/2002	Regnante Sterio & Osborne	\$2,500.00
(255)	6/6/2002	Coach Lane Realty Trust	\$5,250.00
(256)	6/13/2002	Hayes Engineering	\$3,000.00
(257)	7/10/2002	Regnante Sterio & Osborne	\$6,500.00
(258)	7/11/2002	Coach Lane Realty Trust	\$5,250.00
(259)	8/15/2002	Coach Lane Realty Trust	\$5,250.00
(260)	9/13/2002	Coach Lane Realty Trust	\$5,250.00
(261)	10/17/2002	Coach Lane Realty Trust	\$5,250.00
(262)	4/18/2003	N.E Coin Op	\$100,000.00
(263)	05/2003	Cash Deposit	\$50,000.00
(264)	5/7/2003	Roger Williams Mint	\$3,600.00
(265)	5/16/2003	Regnante Sterio & Osborne	\$10,000.00
(266)	5/16/2003	N.E Coin Op	\$50,000.00
(267)	6/6/2003	Roger Williams Mint	\$3,625.00
(268)	6/24/2003	Hayes Engineering	\$5,000.00
(269)	6/30/2003	N.E Coin Op	\$25,000.00
(270)	7/3/2003	Cash Deposit	\$20,000.00
(271)	7/7/2003	Acme Sign Corp	\$8,272.00
(272)	08/2003	Cash Deposit	\$30,000.00

All in violation of Title 18, United States Code, Sections  
1956(a)(1)(B)(i) and 2.



COUNT TWO HUNDRED SEVENTY-THREE

(Conspiracy to commit arson, and travel in interstate commerce to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity.)

1. On or about and before November 13, 2003, in the District of Massachusetts and elsewhere, the defendants

ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
FRANK IACABONI, and  
DEEB HOMSI

and others known and unknown to the grand jury including Michael McCormack and Sean Slater, did conspire, confederate, and agree to: (1) maliciously damage and destroy and attempt to damage and destroy by means of fire and an explosive a building used in interstate commerce and engaged in an activity affecting interstate commerce in violation of Title 18, United States Code, Section 844(i); and (2) travel in interstate commerce to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity in violation of Title 18, United States Code, Section 1952(a)(3); in that the defendants agreed to damage and attempt to damage the building located at 178 Main Street in North Reading, Massachusetts which housed two business establishments by igniting a container of gasoline with a rag affixed and caused Sean Slater to travel from New York to Massachusetts to accomplish the goals of the conspiracy.

MANNER AND MEANS

2. It was a part of the conspiracy that the defendants **GIANELLI** and **DENNIS ALBERTELLI** operated an illegal gambling business. The defendant **GIANELLI** invested a substantial amount of money which included proceeds of this illegal gambling business in the development of a sports bar called the "The Big Dog Sports Grille" located on Route 1 in Lynnfield, Massachusetts. The defendant **GIANELLI** held his ownership interest in the Big Dog Sports Grille through third party nominees in order to conceal said ownership interest.

3. It was further part of the conspiracy that the defendant **GIANELLI** sought to gain a controlling interest in The Canine Entertainment Corporation, the corporation that owned and operated The Big Dog Sports Grille, through threats and intimidation. In furtherance of this objective, the defendants **GIANELLI** and **DENNIS ALBERTELLI** caused a fire to be set at a building which housed a second The Big Dog Sports Grille location in North Reading, Massachusetts in an effort to intimidate certain recalcitrant shareholders of The Canine Entertainment Corporation and to injure those shareholders financially.

4. It was also part of the conspiracy that the defendants **HOMSI** and **IACABONI** attempted to locate and hire individuals to set the fire. Eventually, the defendant **HOMSI** hired Slater and McCormack to set the fire to the building located at 178 Main

Street in North Reading, Massachusetts which housed The Big Dog Sports Grille and another business establishment.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendants

ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
FRANK IACABONI, and  
DEEB HOMSI

and their co-conspirators committed and caused to be committed, in the District of Massachusetts and elsewhere, the following overt acts, among others:

a. On November 2, 2003, the defendants **GIANELLI** and **DENNIS ALBERTELLI** engaged in a conversation related to the arson; particularly, **GIANELLI** told **DENNIS ALBERTELLI**, "Gotta make sure nobody is in there, you know."

b. On November 10, 2003, the defendants **DENNIS ALBERTELLI** and **IACABONI** engaged in a conversation related to the arson; particularly they discussed the appearance of the building located at 178 Main Street in North Reading, Massachusetts.

c. On November 11, 2003, the defendants **GIANELLI** and **DENNIS ALBERTELLI** engaged in a conversation related to the arson; particularly they discussed the timing of the arson.

d. On November 11, 2003, the defendants **DENNIS ALBERTELLI** and **IACABONI** engaged in a conversation related to the

arson; particularly they discussed the timing of the arson.

e. On November 11, 2003, the defendants **DENNIS ALBERTELLI** and **HOMSI** engaged in a conversation related to the arson; particularly they discussed the timing of the arson.

f. On November 11, 2003, the defendant **IACABONI** attended a meeting related to the arson.

g. On or before November 13, 2003, Sean Slater traveled from New York to Massachusetts.

h. On or about November 13, 2003, Sean Slater and Michael McCormack traveled to the vicinity of 178 Main Street in North Reading, Massachusetts.

i. On or about November 13, 2003, Sean Slater ignited a container of gasoline at the entry to Romeo's Pizza located at 178 Main Street in North Reading, Massachusetts.

j. On or about November 22, 2003, Michael McCormack met with the defendants **DENNIS ALBERTELLI** and **HOMSI** at 75 Green Street in Clinton, Massachusetts.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO HUNDRED SEVENTY-FOUR  
(Arson - The Big Dog)

On or about November 13, 2003, in the District of  
Massachusetts, the defendants,

ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
FRANK IACABONI, and  
DEEB HOMSI

aided and abetted by others known and unknown to the grand jury  
and being vicariously liable for the acts of each other and their  
co-conspirators, did maliciously damage and destroy, and attempt  
to damage and destroy, by means of fire and an explosive, a  
building used in interstate commerce and engaged in an activity  
affecting interstate commerce in that the defendants and their  
co-conspirators did damage and attempt to damage the building  
located at 178 Main Street in North Reading, Massachusetts which  
housed two business establishments by igniting a container of  
gasoline with a rag affixed.

In violation of Title 18, United States Code, Sections  
844(i) and 2.

COUNT TWO HUNDRED SEVENTY-FIVE  
(Conspiracy to commit extortion - The Big Dog)

From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
FRANK IACABONI, and  
DEEB HOMSI

and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951.

COUNT TWO HUNDRED SEVENTY-SIX  
(Attempted extortion - The Big Dog)

From in or about and between November 1, 2003 and November 30, 2003, both dates being approximate and inclusive, within the District of Massachusetts, the defendants

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
FRANK IACABONI, and  
DEEB HOMSI**

aided and abetted by others known and unknown to the grand jury and being vicariously liable for the acts of each other and their co-conspirators, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the majority shareholder interest in The Canine Entertainment Corporation with its shareholders' consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss in that the defendants and their co-conspirators did attempt to damage and destroy a building located at 178 Main Street in North Reading, Massachusetts which housed a business establishment which was owned and operated by To The Dogs Restaurant Management, Corp.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWO HUNDRED SEVENTY-SEVEN

(Interstate travel in aid of racketeering enterprises.)

On or about and before November 13, 2003, in the District of Massachusetts and elsewhere, the defendants,

**ARTHUR GIANELLI,  
DENNIS ALBERTELLI, and  
DEEB HOMSI**

aided and abetted by others known and unknown to the grand jury and being vicariously liable for the acts of each other and their co-conspirators, did unlawfully, willfully, and knowingly cause Sean Slater to travel in interstate commerce from New York to Massachusetts, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, namely, arson in violation of Title 18, United States Code, Section 844(i), and did thereafter perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of said unlawful activity in that Sean Slater traveled from New York to Massachusetts to maliciously damage and destroy and attempt to damage and destroy, by means of fire and an explosive, a building used in interstate commerce and engaged in an activity affecting interstate commerce located at 178 Main Street in North Reading, Massachusetts which housed two business establishments.

In violation of Title 18, United States Code, Section 1952(a)(3) and 2.



COUNT TWO HUNDRED SEVENTY-EIGHT  
(Money Laundering - Slater bail)

On or about and between November 22 and November 23, 2003,  
in the District of Massachusetts, the defendants

**DENNIS ALBERTELLI** and  
**DEEB HOMSI,**

aided and abetted by others known and unknown to the Grand Jury,  
knowing that the property involved in financial transactions  
represented the proceeds of some form of unlawful activity,  
conducted and attempted to conduct financial transactions which  
in fact involved the proceeds of illegal gambling activity in  
violation of Title 18, United States Code, Section 1955, to wit,  
the posting of \$5,000 cash bail at the detention facility at  
Cambridge District Court for Sean Slater knowing that the  
transactions were designed in whole or in part to conceal and  
disguise the nature, the location, the source, the ownership, and  
the control of the proceeds of the said unlawful activity.

In violation of Title 18, United States Code, Sections  
1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

COUNT TWO HUNDRED SEVENTY-NINE  
(Conspiracy to commit extortion - McCarthy's)

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti, with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951.

COUNT TWO HUNDRED EIGHTY  
(Attempt to commit extortion - McCarthy's)

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** aided and abetted by others known and unknown to the grand jury, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in Ben-Cor Corporation d/b/a McCarthy's Bar and Grille held by Kelley Cordova and Anthony Bendetti, with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951 and 2.

COUNT TWO HUNDRED EIGHTY-ONE  
(Conspiracy to commit extortion - Clarke's)

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** and others known and unknown to the grand jury, did conspire, confederate and agree to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Section 1951.

COUNT TWO HUNDRED EIGHTY-TWO  
(Attempt to commit extortion - Clarke's)

From in or about and between 1998 and 2002, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI** aided and abetted by others known and unknown to the grand jury, did attempt to affect commerce by extortion, that is, to obtain property, to wit, the shareholder interests in 21 Merchants Row Corporation d/b/a Clarke's Turn of the Century Saloon held by Kelley Cordova and Anthony Bendetti with their consent, which consent was induced by the wrongful use of actual and threatened force, violence, and fear of economic loss.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNTS TWO HUNDRED EIGHTY-THREE THROUGH THREE HUNDRED FIVE  
(Money Laundering - Mazzei)

From in or about September 2002 and continuing until in or about November 2003, in the District of Massachusetts, the defendants **ARTHUR GIANELLI** and **DENNIS ALBERTELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the purchase and negotiation of postal money orders made payable to Daniele Mazzei in the approximate aggregate amount of \$19,000 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Counts</u>	<u>Date</u>	<u>Amount</u>	<u>Serial Number</u>
(283)	9/30/2002	\$600.00	4412670197
(284)	9/30/2002	\$700.00	4412670175
(285)	9/30/2002	\$700.00	4412670186
(286)	11/1/2002	\$600.00	4412674686
(287)	11/1/2002	\$700.00	4412674664
(288)	11/1/2002	\$700.00	4412674675
(289)	1/29/2003	\$700.00	4415762968
(290)	1/29/2003	\$700.00	4415762946
(291)	1/29/2003	\$1,000.00	5034010454
(292)	1/29/2003	\$1,000.00	5034010443
(293)	4/28/2003	\$1,000.00	5558954591

(294)	4/28/2003	\$1,000.00	5558954580
(295)	6/25/2003	\$1,000.00	5558965751
(296)	6/25/2003	\$1,000.00	5558965740
(297)	8/26/2003	\$800.00	5456564762
(298)	8/26/2003	\$800.00	5356564751
(299)	8/26/2003	\$800.00	5356564740
(300)	9/30/2003	\$600.00	5778038711
(301)	9/30/2003	\$1,000.00	5778038698
(302)	9/30/2003	\$1,000.00	5778038700
(303)	11/28/2003	\$600.00	6246618614
(304)	11/28/2003	\$1,000.00	6246618603
(305)	11/28/2003	\$1,000.00	6246618592

All in violation of Title 18, United States Code, Sections  
1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

COUNTS THREE HUNDRED SIX THROUGH THREE HUNDRED EIGHT  
(Money Laundering - Sports Zone, Inc.)

From in or about and between July and August 2002, in the District of Massachusetts, the defendant **ARTHUR GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the investment of said proceeds in Sports Zone, Inc. in the approximate aggregate amount of \$200,000 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count</u>	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
(306)	7/7/02	Cash	\$25,000.00
(307)	8/8/02	Check	\$100,000.00
(308)	8/26/02	Cash	\$75,000.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.



COUNTS THREE HUNDRED NINE THROUGH THREE HUNDRED TWENTY-EIGHT  
(Money Laundering - C&L Management)

From in or about June 2004 and continuing until in or about December 2004, in the District of Massachusetts and elsewhere, the defendant **ARTHUR GIANELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the deposit of said proceeds in Sovereign Bank account number 41004947572 held in the name of Christine A. Leone d/b/a C&L Management in the approximate aggregate amount of \$106,890 as specifically set forth below with intent to promote the carrying on of said unlawful activity and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity

<u>Count</u>	<u>Date</u>	<u>Transaction</u>	<u>Amount</u>
(309)	6/23/2004	Cash	\$5,000.00
(310)	6/25/2004	Cash	\$5,000.00
(311)	6/29/2004	Cash	\$5,000.00
(312)	7/14/2004	Cash	\$1,000.00
(313)	7/20/2004	Cash	\$6,500.00
(314)	8/4/2004	Cash	\$5,000.00
(315)	8/9/2004	Cash	\$9,000.00

(316)	8/11/2004	Cash	\$8,950.00
(317)	8/12/2004	Cash	\$6,200.00
(318)	9/2/2004	Cash	\$9,000.00
(319)	9/14/2004	Cash	\$5,500.00
(320)	9/22/2004	Cash	\$5,400.00
(321)	9/29/2004	Cash	\$5,700.00
(322)	10/15/2004	Cash	\$5,000.00
(323)	10/25/2004	Cash	\$150.00
(324)	11/16/2004	Cash	\$2,940.00
(325)	11/18/2004	Cash	\$7,400.00
(326)	12/15/2004	Cash	\$7,500.00
(327)	12/17/2004	Cash	\$2,150.00
(328)	12/23/2004	Cash	\$4,500.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 2.

COUNTS THREE HUNDRED TWENTY-NINE THROUGH THREE HUNDRED THIRTY-TWO  
(Money Laundering - Mark O'Connor)

From in or about August 2001 and continuing until in or about September 2003, in the District of Massachusetts and elsewhere, the defendant **DENNIS ALBERTELLI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of illegal gambling activity in violation of Title 18, United States Code, Section 1955, to wit, the exchange of cash for checks made payable to Dennele Transportation in the approximate aggregate amount of \$97,049 as specifically set forth below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count</u>	<u>Date</u>	<u>Check</u>	<u>Amount</u>
(329)	8/22/2001	762	\$50,000.00
(330)	5/5/2003	1013	\$17,385.00
(331)	5/5/2003	1014	\$21,280.00
(332)	5/6/2003	1015	\$8,384.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT THREE HUNDRED THIRTY-THREE

(Money Laundering Conspiracy - American Home Builders)

From in or before 1999 and continuing until in or about March 2004, both dates being approximate and inclusive, within the District of Massachusetts and elsewhere, the defendants **JOSEPH YERARDI, JR., RAFIA FEGHI A/K/A RAFIA YERARDI** and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and unlawfully conspire, confederate, and agree to conduct financial transactions, affecting interstate and foreign commerce, as specifically set forth below in Counts Three Hundred Thirty-four through Three Hundred Ninety-five which in fact involved the proceeds of loansharking activity in violation of Title 18, United States Code, Section 891, et seq., knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said illegal loansharking activity.

In violation of Section 1956(h) of Title 18 of the United States Code.

COUNTS THREE HUNDRED THIRTY-FOUR THROUGH THREE HUNDRED NINETY-FIVE (Money Laundering - American Home Builders)

From in or about April 2000 continuing until in or about March 2004, in the District of Massachusetts and elsewhere, the defendants **JOSEPH YERARDI, JR.**, and **RAFIA FEGHI A/K/A RAFIA YERARDI**, aided and abetted by others known and unknown to the Grand Jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct financial transactions which in fact involved the proceeds of loansharking activity in violation of Title 18, United States Code, Section 891, et seq., to wit, the negotiation of checks drawn on the account of American Home Builders in the approximate aggregate amount of \$13,500 as specifically set forth below knowing that the transactions were designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the said unlawful activity.

<u>Count</u>	<u>Check Date</u>	<u>Check No.</u>	<u>Amount</u>
(334)	4/19/2000	13492	\$200.00
(335)	5/10/2000	13688	\$200.00
(336)	5/17/2000	13725	\$200.00
(337)	6/7/2000	13795	\$200.00
(338)	6/14/2000	13822	\$200.00
(339)	6/21/2000	13839	\$200.00
(340)	7/12/2000	13943	\$200.00
(341)	8/2/2000	14005	\$200.00
(342)	8/16/2000	14080	\$200.00
(343)	8/22/2000	14233	\$400.00
(344)	9/27/2000	14244	\$200.00
(345)	10/4/2000	14270	\$200.00
(346)	11/30/2000	14445	\$200.00

(347)	1/10/2001	14573	\$200.00
(348)	1/25/2001	14609	\$200.00
(349)	1/31/2001	14636	\$200.00
(350)	2/11/2001	14674	\$200.00
(351)	4/4/2001	14816	\$200.00
(352)	4/12/2001	14853	\$200.00
(352)	5/2/2001	14932	\$200.00
(352)	6/14/2001	15064	\$200.00
(353)	6/20/2001	15084	\$200.00
(354)	6/23/2001	15005	\$200.00
(355)	7/3/2001	15117	\$200.00
(356)	7/25/2001	15186	\$200.00
(357)	8/29/2001	15291	\$200.00
(358)	9/6/2001	15319	\$200.00
(359)	10/24/2001	15478	\$200.00
(360)	1/23/2002	16345	\$200.00
(361)	2/20/2002	16438	\$200.00
(362)	2/27/2002	16455	\$200.00
(363)	4/2002	16653	\$200.00
(364)	4/17/2002	16614	\$200.00
(365)	5/8/2002	16663	\$200.00
(366)	5/15/2002	16692	\$200.00
(367)	5/23/2002	16726	\$200.00
(368)	5/29/2002	16742	\$200.00
(369)	6/19/2002	16796	\$200.00
(370)	7/3/2002	16850	\$200.00
(371)	7/31/2002	16916	\$200.00
(372)	9/6/2002	17016	\$200.00
(373)	9/21/2002	17081	\$200.00
(374)	10/11/2002	17135	\$200.00
(375)	10/18/2002	17150	\$200.00
(376)	10/28/2002	17170	\$200.00
(377)	11/8/2002	17243	\$200.00
(378)	3/21/2003	17581	\$200.00
(379)	3/28/2003	17602	\$200.00
(380)	4/18/2003	17662	\$200.00
(381)	4/25/2003	17684	\$200.00
(382)	5/23/2003	17792	\$300.00
(383)	6/6/2003	17848	\$200.00
(384)	6/13/2003	17868	\$200.00
(385)	6/28/2003	17915	\$200.00
(386)	8/8/2003	18072	\$200.00
(387)	8/14/2003	18099	\$200.00
(388)	9/19/2003	18205	\$200.00
(389)	10/10/2003	18287	\$400.00
(390)	10/24/2003	18333	\$200.00
(391)	11/7/2003	18380	\$200.00

(392)	12/19/2003	18491	\$200.00
(393)	1/9/2004	18565	\$200.00
(394)	1/23/2004	18604	\$200.00
(394)	3/5/2004	18740	\$200.00
(395)	3/12/2004	18788	\$200.00

All in violation of Title 18, United States Code, Sections  
1956(a)(1)(B)(i) and 2.

RACKETEERING FORFEITURE ALLEGATIONS

1. The allegations of Counts One and Two of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1963.

2. As a result of the offenses in violation of Title 18, United States Code, Section 1962, set forth in Counts One and Two of this indictment, the defendants

ARTHUR GIANELLI,  
JOSEPH A. YERARDI, JR.,  
DENNIS ALBERTELLI,  
SALVATORE RAMASCI,  
RANDY ALBERTELLI,  
GISELE ALBERTELLI,  
RAFIA FEGHI AKA RAFIA YERARDI,  
TONY DANIELS,  
FRANK IACABONI,  
DEEB HOMSI,  
TODD WESTERMAN,  
ENEYDA GONZALEZ RODRIGUEZ, and  
WESHTOD CONSULTANTS AKA WESHTOD CONSULTORES S.A.,

shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 1963(a):

(i) all interests the defendants have acquired and maintained in violation of Title 18, United States Code, Section 1962, wherever located, and in whatever names held;

(ii) all interests in, securities of, claims against, and properties and contractual rights of any kind affording a source of influence over, any enterprise which the defendants have established, operated, controlled, conducted, and participated in



the conduct of, in violation of Title 18, United States Code, Section 1962; and

(iii) all property constituting, and derived from, any proceeds which the defendants obtained, directly and indirectly, from racketeering activity and unlawful debt collection in violation of Title 18, United States Code, Section 1962.

Pursuant to 18 U.S.C. § 1963 and subparagraphs (i), (ii) and (iii) of this paragraph, the defendants shall forfeit all of their joint and several interests in, securities of, claims against, and properties and contractual rights of any kind affording a source of influence over The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille, a Massachusetts corporation, and The Big Dog Realty Trust.

The property to be forfeited by the defendants pursuant to 18 U.S.C. § 1963 and subparagraphs (i) and (iii) of this paragraph includes, but is not limited to, the following assets:

- a. the real property and buildings located at 420 Main Street, Lynnfield, Massachusetts, title to which appears in a deed recorded at the Essex County Registry of Deeds, Book 16986, Page 591;
- b. the real property, with all rights appertaining thereto, known as Unit 334-9, created by Master Deed dated June 30, 1980 and recorded with the Suffolk County Registry of Deeds, Book 9482, Page 186, and

- located at 334 Beacon Street, Unit 9, Boston, Massachusetts, title to which appears in a deed recorded at the Suffolk County Registry of Deeds, Book 22460, Page 248;
- c. the real property, with all rights appertaining thereto, known as Unit No. 405B, as described in the Master Condominium Certificate of Title and in the Master Deed Document No. 614053 as amended and indicated on Condominium Plan No. 17257 C-4, and located at The Gables, Unit 405-B, Dedham Street, Newton, Massachusetts, title to which appears in a deed recorded with the Middlesex Land Court, Document No. U2058, Book U11, Page 58;
- d. Eastern Bank Treasurer's Check number 00691883, in the amount of \$24,039.15, representing all funds on deposit in Eastern Bank account number 0402231385, seized by the Massachusetts State Police on March 9, 2004;
- e. Family Federal Savings Treasurer's Check number 5701, in the amount of \$9,226.89, representing all funds on deposit in Family Federal Savings account number 2012002144, seized by the Massachusetts State Police on March 9, 2004;
- f. Clinton Savings Bank Treasurer's Check number 14360, in the amount of \$6,350.02, representing all funds on

- deposit in Clinton Savings Bank account number 117000980, seized by the Massachusetts State Police on March 9, 2004;
- g. Cambridge Trust Company Treasurer's Check number 110309, in the amount of \$60,844.19, representing all funds on deposit in certificate of deposit account numbers 73503526, 73503527, 73503528, 73503529, 73503531, 73503532, 73503533, 73503534, and 73503535, seized by the Massachusetts State Police on March 9, 2004;
- h. \$3,359.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Arthur Gianelli in Lynnfield, Massachusetts;
- i. \$1,705.00 in United States currency seized by the Massachusetts State Police on March 9, 2004 from Dennis Albertelli in Dracut, Massachusetts;
- j. \$103,155.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts;
- k. \$1,880 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Dennis Albertelli in Hudson, Massachusetts;
- l. \$641.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 48

Pleasant Street, Stoneham, Massachusetts;

- m. one 2.01 carat diamond ring, seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts; and
- n. \$39,000 in United States currency seized on January 6, 2005 from 420 Main Street, Lynnfield, Massachusetts.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 1963, as a result of any act and omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendants up to the value of the property described in subparagraphs a through e hereof, including without limitation:

- (a) Eastern Bank Treasurer's Check number 00691882, in the amount of \$204,594.62, representing all funds on deposit in account number 00200402089, seized by the Massachusetts State Police on March 9, 2004.
- All pursuant to Title 18, United States Code, Section 1963.

GAMBLING FORFEITURE ALLEGATIONS

1. The allegations of Counts Three through Seven of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(c), Title 28 U.S.C., Section 2461(c) and 18 U.S.C. § 1955(d).

2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 1955(d), each defendant who is convicted of one or more of the offenses set forth in Counts Three through Seven of this indictment shall forfeit to the United States the following property:

- (a) Any property, real or personal, which constitutes or is derived from proceeds traceable to each offenses in violation of Title 18, United States Code, Section 1955, and any property, including money, used in violation of the provisions of Title 18, United States Code, Section 1955.
- (b) A sum of money equal to the total amount of proceeds traceable to those offenses, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

The property to be forfeited by the defendants pursuant to Sections 981(a)(1)(C) and 1955(d) includes, but is not limited to, the following assets:

- (a) The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille, a Massachusetts corporation, and The Big Dog Realty Trust;
- (b) the real property and buildings located at 420 Main Street, Lynnfield, Massachusetts, title to which appears in a deed recorded at the Essex County Registry of Deeds, Book 16986, Page 591;
- (c) the real property, with all rights appertaining thereto, known as Unit 334-9, created by Master Deed dated June 30, 1980 and recorded with the Suffolk County Registry of Deeds, Book 9482, Page 186, and located at 334 Beacon Street, Unit 9, Boston, Massachusetts, title to which appears in a deed recorded at the Suffolk County Registry of Deeds, Book 22460, Page 248;
- (d) the real property, with all rights appertaining thereto, known as Unit No. 405B, as described in the Master Condominium Certificate of Title and in the Master Deed Document No. 614053 as amended and indicated on Condominium Plan No. 17257 C-4, and located at The Gables, Unit 405-B, Dedham Street,

Newton, Massachusetts, title to which appears in a deed recorded with the Middlesex Land Court, Document No. U2058, Book U11, Page 58;

- (e) Eastern Bank Treasurer's Check number 00691883, in the amount of \$24,039.15, representing all funds on deposit in Eastern Bank account number 0402231385, seized by the Massachusetts State Police on March 9, 2004;
- (f) Family Federal Savings Treasurer's Check number 5701, in the amount of \$9,226.89, representing all funds on deposit in Family Federal Savings account number 2012002144, seized by the Massachusetts State Police on March 9, 2004;
- (g) Clinton Savings Bank Treasurer's Check number 14360, in the amount of \$6,350.02, representing all funds on deposit in Clinton Savings Bank account number 117000980, seized by the Massachusetts State Police on March 9, 2004;
- (h) Cambridge Trust Company Treasurer's Check number 110309, in the amount of \$60,844.19, representing all funds on deposit in certificate of deposit account numbers 73503526, 73503527, 73503528, 73503529, 73503531, 73503532, 73503533, 73503534, and 73503535, seized by the Massachusetts State Police on March 9, 2004;



- (i) \$3,359.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Arthur Gianelli in Lynnfield, Massachusetts;
- (j) \$1,705.00 in United States currency seized by the Massachusetts State Police on March 9, 2004 from Dennis Albertelli in Dracut, Massachusetts;
- (k) \$103,155.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts;
- (l) \$1,880 in United States currency seized by the Massachusetts State Police on March 5, 2004 from Dennis Albertelli in Hudson, Massachusetts;
- (m) \$641.00 in United States currency seized by the Massachusetts State Police on March 5, 2004 from 48 Pleasant Street, Stoneham, Massachusetts;
- (n) one 2.01 carat diamond ring, seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts; and
- (o) \$39,000 in United States currency seized on January 6, 2005 from 420 Main Street, Lynnfield, Massachusetts.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 1955(d), as a result of any

act and omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 981(b)(1)(A) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all other property of the defendants up to the value of the property listed in subparagraphs a through e hereof, including without limitation:

- a. Eastern Bank Treasurer's Check number 00691882, in the amount of \$204,594.62, representing all funds on deposit in account number 00200402089, seized by the Massachusetts State Police on March 9, 2004.

All pursuant to Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 1955(d).

MONEY LAUNDERING FORFEITURE ALLEGATIONS

1. The allegations of Counts Eight through Two Hundred Seventy-Two, Two Hundred Seventy-Eight, and Two Hundred Eighty-Three through Three Hundred Ninety-Five of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more of the offenses set forth in Counts Eight through Two Hundred Seventy-Two, Two Hundred Seventy-Eight, and Two Hundred Eighty-Three through Three Hundred Ninety-Five of this indictment shall forfeit to the United States the following property:

b. Any property, real or personal, involved in each offense in violation of Title 18, United States Code, Section 1956, for which the defendant is convicted, and all property traceable to such property.

c. A sum of money equal to the total amount of money involved in each offense in violation of Title 18, United States Code, Section 1956, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

The property to be forfeited by the defendants pursuant to Section 982(a)(1) includes, but is not limited to, the following assets:

- (a) The Canine Entertainment Corporation d/b/a The Big Dog Sports Grille, a Massachusetts corporation, and The Big Dog Realty Trust;
- (b) the real property and buildings located at 420 Main Street, Lynnfield, Massachusetts, title to which appears in a deed recorded at the Essex County Registry of Deeds, Book 16986, Page 591;
- (c) the real property, with all rights appertaining thereto, known as Unit 334-9, created by Master Deed dated June 30, 1980 and recorded with the Suffolk County Registry of Deeds, Book 9482, Page 186, and located at 334 Beacon Street, Unit 9, Boston, Massachusetts, title to which appears in a deed recorded at the Suffolk County Registry of Deeds, Book 22460, Page 248;
- (d) the real property, with all rights appertaining thereto, known as Unit No. 405B, as described in the Master Condominium Certificate of Title and in the Master Deed Document No. 614053 as amended and indicated on Condominium Plan No. 17257 C-4, and

located at The Gables, Unit 405-B, Dedham Street, Newton, Massachusetts, title to which appears in a deed recorded with the Middlesex Land Court, Document No. U2058, Book U11, Page 58;

- (e) Eastern Bank Treasurer's Check number 00691883, in the amount of \$24,039.15, representing all funds on deposit in Eastern Bank account number 0402231385, seized by the Massachusetts State Police on March 9, 2004;
- (f) Family Federal Savings Treasurer's Check number 5701, in the amount of \$9,226.89, representing all funds on deposit in Family Federal Savings account number 2012002144, seized by the Massachusetts State Police on March 9, 2004;
- (g) Clinton Savings Bank Treasurer's Check number 14360, in the amount of \$6,350.02, representing all funds on deposit in Clinton Savings Bank account number 117000980, seized by the Massachusetts State Police on March 9, 2004;
- (h) Cambridge Trust Company Treasurer's Check number 110309, in the amount of \$60,844.19, representing all funds on deposit in certificate of deposit account numbers 73503526, 73503527, 73503528, 73503529, 73503531, 73503532, 73503533, 73503534, and 73503535,

seized by the Massachusetts State Police on March 9, 2004; and

- (i) one 2.01 carat diamond ring, seized by the Massachusetts State Police on March 5, 2004 from 151 Hudson Road, Stow, Massachusetts.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 982, as a result of any act and omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1)(A), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all other property of the defendants up to the value of the property listed in subparagraphs a through e hereof, including without

limitation:

- (a) Eastern Bank Treasurer's Check number 00691882, in the amount of \$204,594.62, representing all funds on deposit in account number 00200402089, seized by the Massachusetts State Police on March 9, 2004.

All pursuant to Title 18, United States Code, Section 982.

ARSON FORFEITURE ALLEGATIONS

1. The allegations of Count Two Hundred Seventy-Four of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(B).

2. As a result of the offenses in violation of Title 18, United States Code, Section 844, set forth in Count Two Hundred Seventy-Four of this indictment, the defendants

ARTHUR GIANELLI,  
DENNIS ALBERTELLI,  
FRANK IACABONI, and  
DEEB HOMSI,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offenses.

3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 982, as a result of any act or omission of the defendants

- 
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred to, sold to, or deposited with a third party;



c. has been placed beyond the jurisdiction of this Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1)(A), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of all other property of the defendants up to the value of the property listed in subparagraphs a through e hereof.

All pursuant to Title 18, United States Code, Section 982.

EXTORTION FORFEITURE ALLEGATIONS

1. The allegations of Counts Two Hundred Seventy-Five, Two Hundred Seventy-Six, and Two Hundred Seventy-Nine through Two Hundred Eighty-Two of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), each defendant who is convicted of one or more of the offenses set forth in Counts Two Hundred Seventy-Five, Two Hundred Seventy-Six, and Two Hundred Seventy-Nine through Two Hundred Eighty-Two of this indictment, shall forfeit to the United States the following property:

- (a) Any property, real or personal, which constitutes or is derived from proceeds traceable to each offense in violation of Title 18, United States Code, Section 1951.
- (b) A sum of money equal to the total amount of proceeds traceable to those offenses, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and

severally liable for the amount involved in such offense.

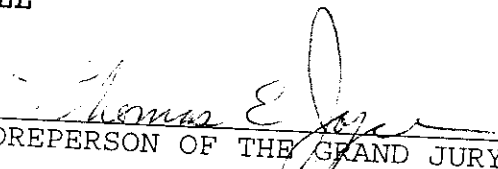
3. If any of the property described in paragraph 2 hereof as being forfeitable pursuant to Title 18, United States Code, Section 981, as a result of any act or omission of the defendants

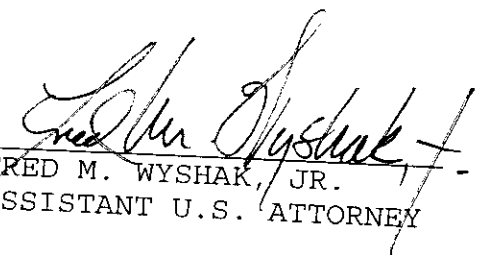
- 
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred to, sold to, or deposited with a third party;
  - c. has been placed beyond the jurisdiction of this Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in subparagraphs a through e hereof.

All pursuant to Title 18, United States Code, Section 981 and 28 United States Code, Section 2461(c).


A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

  
FRED M. WYSHAK, JR.  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; April 7, 2005.

Returned into the District Court by the Grand Jurors and  
filed.

  
DEPUTY CLERK  
1:25P

## Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant X New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_

## Defendant Information:

Defendant Name Arthur Gianelli Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date (Year only): 1957 SSN (last 4 #): 1509 Sex M Race: C Nationality: \_\_\_\_\_Defense Counsel if known: Richard M. Egbert Address: 99 Summer Street, Suite 1800  
Boston, MA 02110

Bar Number: \_\_\_\_\_

## U.S. Attorney Information:

AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☐ Warrant Requested ☐ Regular Process ☐ In Custody

## Location Status:

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody ☐ Serving Sentence ☐ Awaiting Trial☒ On Pretrial Release: Ordered by Judge Swartwood on 1/11/05Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty ☐ Misdemeanor ☒ Felony 311

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Arthur Gianelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Electronic Gaming Machines</u>	<u>4</u>
Set 5	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Football Cards</u>	<u>5</u>
Set 6	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility-Telephone</u>	<u>6</u>
Set 7	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 8	<u>18 USC 1956</u>	<u>Money Laundering Conspiracy</u>	<u>8</u>
Set 9	<u>18 USC 1956 (h)</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 187-234, 236-238</u>
Set 10	<u>18 USC 1956(h)</u>	<u>Money Laundering</u>	<u>239-272, 283-305, 306-308, 309-328</u>
Set 11	<u>18 USC 371</u>	<u>Conspiracy to Commit Arson</u>	<u>273</u>
Set 12	<u>18 USC 844(i) and 2</u>	<u>Arson</u>	<u>274</u>
Set 13	<u>18 USC 1951</u>	<u>Conspiracy to Commit Extortion</u>	<u>275, 279, 281</u>
Set 14	<u>18 USC 1951</u>	<u>Attempt to Commit Extortion</u>	<u>276, 280, 282,</u>
Set 15	<u>18 USC 1952</u>	<u>Interstate travel in aid of racketeering</u>	<u>277</u>

ADDITIONAL INFORMATION:

**Criminal Case Cover Sheet**

U.S. District Court - District of Massachusetts

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
 Same Defendant \_\_\_\_\_ New Defendant X  
 Magistrate Judge Case Number \_\_\_\_\_  
 Search Warrant Case Number \_\_\_\_\_  
 R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**Defendant Name Joseph Yerardi Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address 49 Upham Street, West Newton, MA 02465Birth date (Year only): 1954 SSN (last 4 #): 0715 Sex M Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 245

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Joseph Yerardi, Jr.

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility Telephone</u>	<u>6</u>
Set 5	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 6	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>9, 87, 333</u>
Set 7	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 334-395</u>
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:



**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant X New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Dennis Albertelli Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date (Year only): 1952 SSN (last 4 #): 2336 Sex M Race: C Nationality: \_\_\_\_\_Defense Counsel if known: Charles Rankin Address: 1 Commercial Wharf North  
Boston, MA 02110

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☐ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☒ On Pretrial Release: Ordered by Judge Swartwood on 1/11/05Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 296

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/05Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Dennis Albertelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Electronic Gaming Machines</u>	<u>4</u>
Set 5	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Football Cards</u>	<u>5</u>
Set 6	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility-Telephone</u>	<u>6</u>
Set 7	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 8	<u>18 USC 1956</u>	<u>Money Laundering Conspiracy</u>	<u>8</u>
Set 9	<u>18 USC 1956 (h)</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 187-234, 236-238</u>
Set 10	<u>18 USC 1956(h)</u>	<u>Money Laundering</u>	<u>239-272, 278, 283-305, 329-332</u>
Set 11	<u>18 USC 371</u>	<u>Conspiracy to Commit Arson</u>	<u>273</u>
Set 12	<u>18 USC 844(i) and 2</u>	<u>Arson</u>	<u>274</u>
Set 13	<u>18 USC 1951</u>	<u>Conspiracy to Commit Extortion</u>	<u>275</u>
Set 14	<u>18 USC 1951</u>	<u>Attempt to Commit Extortion</u>	<u>276</u>
Set 15	<u>18 USC 1952</u>	<u>Interstate travel in aid of racketeering.</u>	<u>277</u>

ADDITIONAL INFORMATION:

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant \_\_\_\_\_ New Defendant X  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Salvatore Ramasci a.k.a. "Lefty" Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address 48 Pleasant Street, Stoneham, MABirth date (Year only): 1956 SSN (last 4 #): 6551 Sex M Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 217

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Salvatore Ramasci, a.k.a. "Lefty"

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1955 and 2</u>	<u>Illegal Gambling Business - Electronic Gambling Machines</u>	<u>4</u>
Set 5	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility Telephone</u>	<u>6</u>
Set 6	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 7	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>8</u>
Set 8	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>10-86, 88-185, 239-272</u>
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

## Criminal Case Cover Sheet

**U.S. District Court - District of Massachusetts**

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBI

City Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
 Same Defendant \_\_\_\_\_ New Defendant X  
 Magistrate Judge Case Number \_\_\_\_\_  
 Search Warrant Case Number \_\_\_\_\_  
 R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**

Defendant Name Randy Albertelli Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address 151 Hudson Road, Stow, MA 01775

Birth date (Year only): 1979 SSN (last 4 #): 5466 Sex M Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

**Defense Counsel if known:** \_\_\_\_\_ **Address:** \_\_\_\_\_

**Bar Number:** \_\_\_\_\_

**U.S. Attorney Information:**

**AUSA** Michael L. Tabak **Bar Number if applicable** \_\_\_\_\_

Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_

**Matter to be SEALED:** ☒ Yes ☐ No

☒ Warrant Requested                      ☐ Regular Process                      ☐ In Custody

**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_.

☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor ☒ Felony 7

**Continue on Page 2 for Entry of U.S.C. Citations**

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

**Date:** 4/7/2005

Signature of AUSA: *William E. Jahn*

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Randy Albertelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Football Cards</u>	<u>5</u>
Set 5	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility Telephone</u>	<u>6</u>
Set 6	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant                      New Defendant X  
Magistrate Judge Case Number                       
Search Warrant Case Number                       
R 20/R 40 from District of                     **Defendant Information:**Defendant Name Gisele Albertelli Juvenile ☐ Yes ☒ NoAlias Name                     Address 151 Hudson Road, Stow, MA 01775Birth date (Year only): 1955 SSN (last 4 #): 3092 Sex F Race:                      Nationality:                     Defense Counsel if known:                      Address:                     Bar Number:                     **U.S. Attorney Information:**AUSA Michael L. Tabak Bar Number if applicable                     Interpreter: ☐ Yes ☒ No List language and/or dialect:                     Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**Arrest Date:                     ☐ Already in Federal Custody as                      in                     ☐ Already in State Custody                      ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by                      on                     Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty                      ☐ Misdemeanor                      ☒ Felony 52

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Gisele Albertelli

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955 and 2</u>	<u>Illegal Gambling Business - Football Cards</u>	<u>5</u>
Set 4	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>186</u>
Set 5	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>187-234</u>
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:



**Criminal Case Cover Sheet**

**U.S. District Court - District of Massachusetts**

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBI

City Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant \_\_\_\_\_ New Defendant X  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**

Defendant Name Rafia Feghi Juvenile ☐ Yes ☒ No

Alias Name a.k.a. Rafia Yerardi

Address 405B Dedham Street, Newton, MA 02459

Birth date (Year only): 1947 SSN (last 4 #): 6387 Sex F Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**

AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_

Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_

Matter to be SEALED: ☒ Yes ☐ No

☒ Warrant Requested ☐ Regular Process ☐ In Custody

**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_

☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 143

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 4/7/2005

Signature of AUSA: Michael L. Tabak

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Rafia Feghi

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>9, 333</u>
Set 4	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>10-86, 334-395</u>
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant \_\_\_\_\_ New Defendant X  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Tony Daniels Juvenile ☐ Yes ☒ NoAlias Name a.k.a. "Sonny"Address 14 Pinetree Drive, Saugus, MA 01960Birth date (Year only): 1951 SSN (last 4 #): 5466 Sex M Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status:

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 9

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Tony Daniels a.k.a. "Sonny"

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility Telephone</u>	<u>6</u>
Set 5	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 6	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>235</u>
Set 7	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>236-238</u>
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

## Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant X New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_

## Defendant Information:

Defendant Name Frank Iacaboni Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date (Year only): 1944 SSN (last 4 #): 6570 Sex M Race: C Nationality: \_\_\_\_\_Defense Counsel if known: John Brazilian Address: 1 Exeter Plaza  
Boston, MA 02116

Bar Number: \_\_\_\_\_

## U.S. Attorney Information:

AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☐ Warrant Requested ☐ Regular Process ☐ In Custody

## Location Status:

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☒ On Pretrial Release: Ordered by Judge Swartwood on 1/11/05Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 8

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Frank Iacaboni

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Football Cards</u>	<u>5</u>
Set 5	<u>18 USC 371</u>	<u>Conspiracy to Commit Arson</u>	<u>273</u>
Set 6	<u>18 USC 844(i) and 2</u>	<u>Arson</u>	<u>274</u>
Set 7	<u>18 USC 1951</u>	<u>Conspiracy to Commit Extortion</u>	<u>275</u>
Set 8	<u>18 USC 1951</u>	<u>Attempt to Commit Extortion</u>	<u>276</u>
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

## Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant X New Defendant \_\_\_\_\_  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_

## Defendant Information:

Defendant Name Deeb Homsy Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date (Year only): 1960 SSN (last 4 #): 3350 Sex M Race: C Nationality: \_\_\_\_\_Defense Counsel if known: Roger A. Cox Address: 30 Main Street  
Ashland, MA 01721

Bar Number: \_\_\_\_\_

## U.S. Attorney Information:

AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☐ Warrant Requested ☐ Regular Process ☐ In Custody

## Location Status:

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody ☐ Serving Sentence ☐ Awaiting Trial☒ On Pretrial Release: Ordered by Judge Swartwood on 1/7/05Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty ☐ Misdemeanor ☒ Felony 8

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Deeb Homs

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>2</u>
Set 3	<u>18 USC 371</u>	<u>Conspiracy to Commit Arson</u>	<u>273</u>
Set 4	<u>18 USC 844(i) and 2</u>	<u>Arson</u>	<u>274</u>
Set 5	<u>18 USC 1951</u>	<u>Conspiracy to Commit Extortion</u>	<u>275</u>
Set 6	<u>18 USC 1951</u>	<u>Attempt to Commit Extortion</u>	<u>276</u>
Set 7	<u>18 USC 1952</u>	<u>Interstate travel in aid of racketeering</u>	<u>277</u>
Set 8	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>278</u>
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:



**U.S. District Court - District of Massachusetts**

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBI

City Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
 Same Defendant \_\_\_\_\_ New Defendant X  
 Magistrate Judge Case Number \_\_\_\_\_  
 Search Warrant Case Number \_\_\_\_\_  
 R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**

Defendant Name Todd Westerman Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address Office Central La Sabana, San Jose, Costa Rica

Birth date (Year only): 1963 SSN (last 4 #): 3260 Sex M Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

**Defense Counsel if known:** \_\_\_\_\_ **Address:** \_\_\_\_\_

**Bar Number:**

**U.S. Attorney Information:**

**AUSA** Michael L. Tabak **Bar Number if applicable**

Interpreter: ☐ Yes ☒ No List language and/or dialect:

**Matter to be SEALED:** ☒ Yes ☐ No

☒ Warrant Requested      ☐ Regular Process      ☐ In Custody

**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_.

☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_

**Charging Document:** ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty            ☐ Misdemeanor ☒ Felony 9

**Continue on Page 2 for Entry of U.S.C. Citations**

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**Date:** 4/7/2005

**Signature of AUSA:**

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Todd Westerman

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility Telephone</u>	<u>6</u>
Set 5	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 6	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>235</u>
Set 7	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>236-238</u>
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

## Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:

County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
 Same Defendant \_\_\_\_\_ New Defendant X  
 Magistrate Judge Case Number \_\_\_\_\_  
 Search Warrant Case Number \_\_\_\_\_  
 R 20/R 40 from District of \_\_\_\_\_

## Defendant Information:

Defendant Name Encyda Gonzalez Rodriquez Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address Office Central La Sabana, San Jose, Costa RicaBirth date (Year only): \_\_\_\_\_ SSN (last 4 #): \_\_\_\_\_ Sex F Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

## U.S. Attorney Information:

AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody

## Location Status:

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 9

Continue on Page 2 for Entry of U.S.C. Citations

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District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Eneyda Gonzalez Rodriquez

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility Telephone</u>	<u>6</u>
Set 5	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 6	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>235</u>
Set 7	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>236-238</u>
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Boston Category No. 1 Investigating Agency ATF/IRS/MSP/FBICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. Indictment Case No. 05-10003-NMG  
Same Defendant \_\_\_\_\_ New Defendant X  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Weshtod Consultants AKA Weshtod Consultores S.A. Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address Office Central La Sabana, San Jose, Costa Rica

Birth date (Year only): \_\_\_\_\_ SSN (last 4 #): \_\_\_\_\_ Sex \_\_\_\_\_ Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Michael L. Tabak Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 9

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/7/2005Signature of AUSA: Michael L. Tabak

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Weshtod Consultants AKA Weshtod Consultores S.A.

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 USC 1962</u>	<u>Racketeering Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 1962</u>	<u>Racketeering</u>	<u>2</u>
Set 3	<u>18 USC 1955</u>	<u>Illegal Gambling Business - Sports Betting</u>	<u>3</u>
Set 4	<u>18 USC 1084 and 2</u>	<u>Use of Wire Communication Facility Telephone</u>	<u>6</u>
Set 5	<u>18 USC 1084</u>	<u>Use of Wire Communication Facility - Internet</u>	<u>7</u>
Set 6	<u>18 USC 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>235</u>
Set 7	<u>18 USC 1956</u>	<u>Money Laundering</u>	<u>236-238</u>
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: